

# Exhibit 5

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IN THE MATTER OF THE INDEPENDENT  
INVESTIGATION UNDER EXECUTIVE  
LAW 63(8)

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VIRTUAL ZOOM INVESTIGATION  
May 20, 2021  
11:00 a.m.

VIDEO RECORDED TESTIMONY of LINDSEY BOYLAN taken by  
First Deputy Attorney General of the New York Attorney  
General's Office in the above-entitled action, remotely  
held via Zoom before Sara K. Killian, a Registered  
Professional Reporter, Certified Court Reporter and Notary  
Public of the State of New York.

1

2 A P P E A R A N C E S :

3

4 CLEARY GOTTlieb STEEN & HAMILTON, LLP

5 Attorneys for the New York State Attorney

6 General's Office

7 One Liberty Plaza

8 One Liberty Place

9 New York, New York 10006

10 BY: JENNIFER KENNEDY PARK, ESQ.

11 JOON R. KIM, ESQ.

12

13

14

15 VLADECK RASKIN & CLARKE, PC

16 Attorneys for the New York State Attorney

17 General's Office

18 565 Fifth Avenue

19 New York, New York 10017

20 BY: ANNE CLARK, ESQ.

21 EZRA CUKOR, ESQ.

22

23 ALSO PRESENT:

24 JILL BASINGER, ESQ.

25 MARCO SOZIO, Veritext Videographer

1  
2 THE VIDEOGRAPHER: Good morning. We  
3 are going on the record at 11:19 a.m. on  
4 May 20th, 2021.

5 Please note that the microphones are  
6 sensitive and may pick up whispering, private  
7 conversations and cellular interference.  
8 Please turn off all cell phones or place them  
9 away from the microphones, as they can  
10 interfere with the deposition audio. Audio  
11 and video recording will continue to take  
12 place unless all parties agree to go off the  
13 record.

14 This is media unit one of the  
15 recorded interview of Witness May 20, 2021,  
16 taken by Special Deputy for the New York  
17 Attorney General's office in the matter of  
18 Independent Investigation under New York  
19 State Executive Law Section 63(8). This  
20 deposition is being held remote virtual Zoom  
21 located in New York, New York 10011.

22 My name is Marco Sozio from the firm  
23 Veritext and I'm the videographer. The court  
24 reporter is Sara Killian from the firm  
25 Veritext New York. I am not authorized to

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administer an oath.

Will the court reporter please swear  
in the witness?

L I N D S E Y B O Y L A N, after having first  
been duly sworn by a Notary Public of the State of  
New York, was examined and testified as follows:

MS. CLARK: Good morning, Ms. Boylan.  
Thank you for joining us again today. My  
name -- I'll introduce myself again. My name  
is Anne Clark and I've been appointed a  
Special Deputy to the First Deputy Attorney  
General.

Before I launch into some other  
introductory remarks, I'll let everybody else  
introduce or re-introduce themselves.

Joon?

MR. KIM: Thanks.

Good to see you again. My name is  
Joon Kim. I'm also, along with Anne Clark,  
been designated as a Special Deputy to the  
First Deputy Attorney General conducting the  
investigation. Good to see you and thank you  
for joining us.

MS. CLARK: Jenn?

1 L. Boylan

2 MS. KENNEDY PARK: Hi, Ms. Boylan.  
3 It's good to see you again. I'm Jennifer  
4 Kennedy Park, I'm one of Joon's partners at  
5 Cleary Gottlieb in New York and I'm also one  
6 of the Special Deputies.

7 MS. CLARK: Ezra?

8 MR. CUKOR: I'm Ezra Cukor. It's  
9 good to see you again, Ms. Boylan. I'm from  
10 the law firm Vladeck Raskin & Clark and I've  
11 also been appointed to work with Anne on this  
12 investigation.

13 MS. CLARK: So as you know, the New  
14 York Attorney General has appointed my firm,  
15 Vladeck Raskin & Clark --

16 MS. BASINGER: I apologize, Anne.  
17 For your record, Jill Basinger is  
18 present as counsel for the record.

19 EXAMINATION BY

20 MS. CLARK:

21 Q. All right.

22 As you know, the New York Attorney  
23 General has appointed my firm, Vladeck Raskin &  
24 Clarke, and the law firm of Cleary Gottlieb Steen  
25 & Hamilton to conduct an independent investigation

1 L. Boylan

2 under New York Executive Law Section 63(8) into  
3 allegations of sexual lamenter brought against  
4 Governor Andrew Cuomo as well as the surrounding  
5 circumstances, as was noted. You are here today  
6 pursuant to a subpoena issued in connection with  
7 this investigation.

8 I'll note, although you heard the  
9 intro at the beginning, that this is being video  
10 recorded. You've been sworn in, so you are under  
11 oath, which means you must testify truthfully and  
12 fully to the best of your ability as if you were  
13 in a court of law in front of a judge and jury.

14 If at the end of our discussion you  
15 want to make a brief sworn statement to add  
16 anything we didn't address, you are welcome to do  
17 so. I will remind you again at the end.

18 This is a civil investigation, but I  
19 am just letting you know that the Attorney  
20 General's Office also has criminal enforcement  
21 powers. So we notify everybody that you have the  
22 right to refuse to answer a question if you think  
23 it might incriminate you. If you fail to answer  
24 or refuse to answer a question, it could be used  
25 against you in a court in any civil proceeding,

1 L. Boylan

2 not in a criminal proceeding.

3 You are appearing today with your  
4 attorney present and she can advise you about  
5 things like privilege, but she otherwise cannot  
6 make objections or interject.

7 As you can see, we have a court  
8 reporter in addition to the videographer present  
9 with us today and she's going to be taking down  
10 what each of us says to create a written record.  
11 In order to create a clean written record, it's  
12 important that you give a verbal response to my  
13 questions.

14 A. Okay.

15 Q. If you gesture or nod or say mm-hmm,  
16 that doesn't come out so well. Her job is  
17 difficult if we speak at the same time. It's  
18 harder with video, but I will do my best to wait  
19 until you finish speaking before I ask my next  
20 questions and I'll ask that you let me get my  
21 whole question out, even if you think you know  
22 where I'm headed, before you start talking because  
23 we if we talk about the same time, it's difficult.

24 If at any point I ask a question and  
25 you don't understand it, let me know and I'll



1 L. Boylan

2 rephrase it in a way that makes more sense.

3 At times, I might ask you about  
4 details like names or dates. If you know them,  
5 that's great. If you don't, if you can give as  
6 much information as you have. If you don't know  
7 the exact date, say it was springtime or you know  
8 somebody's first name or anything along those  
9 lines.

10 You will not be permitted to get --  
11 you won't get a copy of the transcript of this  
12 proceeding. But if along the way while we're  
13 talking you realize that something you said  
14 earlier isn't accurate or you remember something  
15 additional to an earlier question, just let us  
16 know, we're happy to address anything you said  
17 previously.

18 If you need a break at any point, let  
19 us know. We will be taking breaks, if for nothing  
20 else to change the media. I just ask that you  
21 answer any question before we take a break so  
22 there's no question pending.

23 Then, we just want to confirm a few  
24 things. I want to confirm are you alone in the  
25 room you are in?

1 L. Boylan

2 A. Yes.

3 MS. CLARK: Ms. Basinger, are you  
4 alone as well?

5 Ms. Basinger is -- she's muted.

6 MS. BASINGER: I apologize.

7 Yes, I am.

8 MS. CLARK: That's okay.

9 Q. I want to confirm that neither you  
10 nor your counsel are using any technology to  
11 create your own recording of the proceedings,  
12 including any screen capturing tools.

13 Is that correct?

14 A. Yes. I'm not doing that.

15 MS. BASINGER: Yes.

16 Q. I want to confirm that neither you  
17 nor your counsel are allowing anyone else to  
18 listen in including through other devices.

19 Is that correct?

20 A. Correct.

21 MS. BASINGER: Correct.

22 Q. I just want to advise you and your  
23 counsel that neither of you can communicate in  
24 realtime or during breaks about what's going on in  
25 today's proceeding, as well as that -- under

1 L. Boylan

2 Executive Law 63(8), this testimony is  
3 confidential, so you are not permitted or your  
4 counsel is not permitted either to share with  
5 anyone what we ask you about, what information you  
6 provided to us. If anyone asks you to disclose  
7 that information, please let us know, including if  
8 they provided any reason why they're asking for  
9 this information.

10 Are you on any medication that would  
11 affect your ability to testify accurately and  
12 truthfully today?

13 A. No.

14 Q. Have you had any alcohol today?

15 A. No.

16 Q. Is there any reason why you can't  
17 testify accurately and truthfully today?

18 A. No.

19 Q. Okay.

20 If you could for the record state  
21 your name, date of birth and current home and  
22 business addresses, please?

23 A. My name is Lindsey Boylan, I'm [REDACTED]  
24 [REDACTED], I live at [REDACTED]  
25 [REDACTED] and I'm running for office, so I work

1 L. Boylan

2 for myself and we have an office, but my office is  
3 here.

4 Q. Have you ever given testimony in any  
5 other proceedings, deposition, trial, anything  
6 like that?

7 A. Never.

8 Q. Other than speaking with your  
9 attorney -- because I don't want to know about  
10 that -- have you done anything else to prepare for  
11 today's testimony?

12 A. I took a long walk and I have  
13 lavender oil next to me for stress, but no.  
14 Nothing other than that, no.

15 Q. Were you sent -- yes.  
16 If you could break the seal on that  
17 and open that up --

18 A. This is bizarrely like Christmas or  
19 something.

20 Q. Okay.  
21 If you could turn to tab one --

22 A. Okay.

23 Q. This is a document subpoena that we  
24 sent to you.

25 Have you reviewed this?

1 L. Boylan

2 A. I've reviewed the document that Jill  
3 sent me about the rules of the subpoena, but I  
4 don't know what, you know, this thing that I'm  
5 looking at. This looks like the thing that I  
6 have.

7 Q. Okay.

8 And this asks you to look for various  
9 documents that that would --

10 A. Yes.

11 Q. -- relevant to our investigation.

12 A. Yes.

13 Q. Are you the person that gathered the  
14 documents that you provided --

15 A. Yes.

16 Q. -- to your attorney to give to us?

17 A. Yes. And that's everything to my  
18 knowledge that I know that would be germane.

19 Q. What devices or locations did you  
20 search to obtain documents to send to us?

21 A. I looked in my mailbox, email box, I  
22 had screenshotted photos on my iPhone and that was  
23 saved in the Cloud, even though I lost, like, five  
24 iPhones since I worked there, and I talked to a  
25 few friends and my mom and friends who remembered

1 L. Boylan

2 conversations either at the time or afterwards

3 related to the --

4 (Reporter clarification)

5 MS. BASINGER: I'm trying to open  
6 this package because whoever sealed it did a  
7 really, really good job.

8 MS. CLARK: Sorry, Jill.

9 MS. BASINGER: I'm still trying to  
10 rip things. All right. Well, you have very  
11 good people in your staff because they really  
12 sealed that well.

13 MS. CLARK: The Cleary people  
14 are serious about sealing things up.

15 MS. BASINGER: The Cleary people were  
16 not playing.

17 THE COURT REPORTER: Okay, but the  
18 audio. I'm losing some of the answers.

19 MS. CLARK: Ms. Killian, what did you  
20 get on the last answer?

21 (Whereupon, the record was read back  
22 by the reporter.)

23 A. -- to the incidents that I have  
24 shared.

25 And when I said five iPhones, I was

1 L. Boylan

2 generalizing. That was not intended to be a  
3 specific number. I just meant I've a lost a lot  
4 of phones since then.

5 Q. If you could turn to tab two in the  
6 binder in front of you --

7 A. Yes.

8 Q. -- this is the subpoena for your  
9 testimony today.

10 Did you review that when you got  
11 that?

12 A. Yes.

13 Q. You understand that you're appearing  
14 today pursuant to that subpoena under oath,  
15 correct?

16 A. Yes.

17 Q. Okay.

18 You can put that aside for now. I'm  
19 going to just ask you a few questions about your  
20 background.

21 How far did you get in school?

22 A. I have my MBA from Columbia Business  
23 School. I did the executive program while working  
24 full-time and before that, I have an BA from  
25 Wellesley College in political science.

1 L. Boylan

2 Q. When did you get your MBA?

3 A. 2012.

4 Q. When did you get your bachelor's?

5 A. 2006.

6 Q. If you could sort of walk us there  
7 your employment from 2006 until you came to work  
8 for New York State, that would be great.

9 A. So I came to New York after  
10 graduating from Wellesley. I didn't have a job.  
11 I was -- I moved in with my boyfriend at the time  
12 and looked for work and I got a job in urban  
13 planning, working for a small firm run by a  
14 professor at Yale, Alexander Garvin. He's a very  
15 well known urban planner, particularly in parks  
16 management.

17 I started off as an admin, which is  
18 what typically happens, and then I became a  
19 project manager in the course of that year for a  
20 master planning process for a park in Memphis,  
21 Tennessee. So I went back several times back and  
22 forth and my work had me comparing the management  
23 structures for other parks, primarily in New York  
24 City, wherein I was able to interview and get to  
25 know Dan Peterman, who runs and ran at the time



1 L. Boylan

2 Bryant Park, and after about a year of, you know,  
3 not really having anywhere to go in the  
4 organization, I ended up taking a job as an  
5 operations manager at Bryant Park and the  
6 interconnected Business Improvement Districts.

7 I was there ultimately I think for  
8 about five and a half years and I continued to go  
9 up the ranks, ultimately as Director of Business  
10 Affairs, I think is the title that we had, but  
11 overseeing, you know, both, you know, corporate  
12 partnerships and sanitation, hospitality crews and  
13 the day-to-day management of the park as well as  
14 Herald and Greeley and the 31st Street Partnership  
15 and the like.

16 I also did business school and the  
17 executive program in the last two years of my  
18 employment there and they did contribute to that  
19 MBA work. After I graduated in 2012, I had just  
20 gotten married as well and wanted to change and I  
21 went into client strategy at an investment bank,  
22 RBC, that does municipal finance because following  
23 the financial crisis, I kind of wanted to  
24 understand how the financing side of it of  
25 infrastructure and municipal government worked. I

1 L. Boylan

2 was there for, I think, about two and a half  
3 years, [REDACTED]

4 [REDACTED]  
5 realized I didn't want to be in investment  
6 banking. I had built some connections over time.  
7 One of the people who did PR work for RBC and  
8 municipal finance that I connected with suggested  
9 that after the Governor's re-election was a good  
10 time to try and get in State service, which was  
11 always my goal, to get in government directly  
12 eventually, because people would, you know, be  
13 leaving and coming in.

14 So I think I sent my résumé in in the  
15 winter of -- let's see, [REDACTED] so  
16 the fall or the winter of 2014. You know, I was  
17 really unhappy there because, you know, [REDACTED]  
18 [REDACTED] and, you know, you think if I'm going  
19 to be away, I want it to be something meaningful  
20 and I didn't want to be in investment banking. So  
21 that was after the Governor's re-election. I did  
22 not know the Governor and I sent my résumé into  
23 the HR portal and at the suggestion of both -- why  
24 can't I think of their names? -- they're people  
25 germane to all of this and the retaliation

1 L. Boylan

2 accusations -- Rich Bamberger, who had been the  
3 client strategy, you know, work that I had done at  
4 RBC, you know, he knew how state government worked  
5 and there's another individual at Kibbit now, too.  
6 I can't remember his name.

7 They suggested I put my résumé in, my  
8 résumé was found or I think [REDACTED], who  
9 was working for the State at the time, suggested  
10 it would be a good fit for the State's Economic  
11 Development Agency, which was Empire State  
12 Development. So my résumé was passed there.

13 I got -- I think that would have been  
14 early 2015 -- a VP role for Business Development  
15 at Empire State Development and ultimately, that  
16 component was intended to oversee regional  
17 economic development for the State, but, you know,  
18 if you're familiar with State government, you are  
19 either in the flow or you're not that and it was  
20 not a particularly powerful person who headed up  
21 that component, so it was kind of a sucky job  
22 honestly, so I was trying to look internally where  
23 I could grow, you know. So I kept trying to get  
24 to know people in the different departments and,  
25 you know, see where I might be able to be more

1 L. Boylan

2 happy and challenged.

3 And in that process, around the same  
4 time within a few months of when I joined Empire  
5 State Development, the existing Chief of Staff had  
6 left and the new Commissioner, Howard Zemsky, was  
7 looking to replace that person and government  
8 Chief of Staff is kind of, like, a right-hand  
9 person and because I think I had been talking to a  
10 number of different departments, people said hey,  
11 you should check this person out, she's pretty  
12 smart, whatever, so I got that job.

13 Q. Let me stop you.

14 I want to ask a few things about what  
15 you've told me so far about when you joined ESD.

16 You said Rich Bamberger suggested it.  
17 Was the other person John Glasto?

18 A. Yes, Josh Glasto. Josh.

19 Q. I'm sorry.

20 What was that?

21 A. Rich Bamberger had introduced me to  
22 Josh because they had worked together in state  
23 service.

24 Q. Okay.

25 Did either of them tell you anything

1 L. Boylan

2 about what it was like to work for the State  
3 before you put in the application?

4 A. At some point, I think they shared  
5 anecdotal stories about how much they hated Linda  
6 Lacewell and how hard it was to work with her, but  
7 nothing more than that.

8 Q. Did you speak to anyone else who had  
9 worked in the Cuomo administration before you  
10 joined ESD?

11 A. Right around the time that I was  
12 offered the position -- I don't know if I had  
13 already started yet. Candidly, I don't remember  
14 the exact timing -- but [REDACTED], who at  
15 the time ran Association for a Better New York and  
16 had actually been Chief of Staff at Empire State  
17 Development said, you know, just be careful, you  
18 know, don't end up interacting with or be careful  
19 around the Governor. I just had to kill a story  
20 about him and women.

21 And, you know, I thought it was a  
22 weird -- something worth thinking about, but this  
23 was a huge state government apparatus and frankly,  
24 I didn't think I was going to be interacting at  
25 all with the Governor and also, frankly, every job

1 L. Boylan

2 I had ever had, there was some weird older man who  
3 was kind of creepy with women. So all of these  
4 things were not that surprising to me and didn't  
5 really -- it's something I remembered but then  
6 kind of just, you know, filed away mentally.

7 Q. When you were Vice President, who did  
8 you report to?

9 A. [REDACTED]

10 Q. How many months did you hold that  
11 Vice President position?

12 A. I want to say around, you know, five  
13 to seven months. I'm not sure exactly the dates  
14 and candidly, I'm not great with dates, just so  
15 you know.

16 Q. What were your responsibilities  
17 during the time that you were Vice President?

18 A. His responsibility was to oversee all  
19 of these regional offices to do job creation, so  
20 there are ten regional offices across the state,  
21 but he didn't have the respect of the people that  
22 were working in those offices and he was pretty  
23 lazy, so you know whatever -- whatever dynamic he  
24 had at play, my role was degenerative of that,  
25 which is why the role wasn't that fun, candidly.

1 L. Boylan

2 Q. What is it that you sort of did on a  
3 day-to-day basis during that period?

4 A. I would travel around the state, I  
5 would go to Regional Economic Development Council  
6 meetings, I tried to meet all of the regional  
7 directors, which is one of the, you know, things  
8 that became really meaningful in my employment at  
9 Empire State Development because these are the  
10 local regional leaders who are trying to do job  
11 creation that is consistent with the economies of  
12 their local areas. So that was a lot of fun. I  
13 got to know the, you know, Finger Lakes, western  
14 New York, you know, all these different regions of  
15 the state and that was fascinating.

16 Q. Who was the person that was leaving  
17 the Chief of Staff position?

18 A. I'm trying to remember his name at  
19 this point. I would know -- it's someone I know.  
20 He went into the real estate sector just before  
21 me. If you said it, I would say yes or no. I  
22 can't remember his name right now.

23 Q. Who did you interview with to become  
24 Chief of Staff, if anyone?

25 A. Howard made that decision.

1 L. Boylan

2 Q. And Howard is Howard Zemsky?

3 A. Yes.

4 Q. Do you recall interviewing with  
5 anyone else to get that position?

6 A. I met with I think [REDACTED]. You  
7 know, I met with a lot of the senior staff, but  
8 the way that that process worked, I'm not  
9 entirely, you know, privy to what -- if those were  
10 actually interviews or, you know, kind of  
11 marketing and tourism, [REDACTED], if he was just  
12 someone, you know, like -- I don't know if I was  
13 just being interviewed or if I had just known him  
14 before and suggested that behind the scenes.

15 But formality was not really  
16 something that I experienced a lot of when I was  
17 there or in the State General.

18 Q. How long did you hold the Chief of  
19 Staff position?

20 A. Well, it would have been I think the  
21 fall of 2015, roughly in there, until I left  
22 officially to work for the Governor, which was at  
23 the end of 2017, early 2018.

24 I would say as an aside what is  
25 reflected in the announcements -- public



1 L. Boylan

2 announcements -- typically is, like, many months  
3 behind the actual thing happening for any number  
4 of logistical reasons, so I wouldn't base it off  
5 that. Typically, I had all of these jobs before  
6 the announcements came out. But I don't know  
7 exact dates. As I said, I can -- I'm a visual --  
8 I have a graphic memory, but not a date one.

9 Q. Did you report directly to Mr. Zemsky  
10 when you became Chief of Staff?

11 A. Yes.

12 Q. What were your responsibilities as  
13 Chief of Staff?

14 A. I had to oversee all those regional  
15 offices and really try to integrate them into the  
16 work of the State and this was a particular  
17 powerful agency for the State as a whole and even  
18 though I didn't know the Governor at the  
19 beginning, it was clear that he used these -- to  
20 some extents to the same way that he did a lot of  
21 regional work at HUD, so these were seen as a hub  
22 of integrating different activities at that state.  
23 So these were really important relationships and I  
24 loved working with the regional offices. It was  
25 the great joy of my time.

1 L. Boylan

2 Q. Other than interacting with the  
3 regional offices during the time you were Chief of  
4 Staff, who were the other people in state  
5 government that you interacted with the most?

6 A. At the beginning, I interacted just  
7 primarily with ESD and all of the senior staff, so  
8 the real estate segment, the press segment, the  
9 marketing and tourism segment. You know, all of  
10 the different parts so to speak.

11 But pretty quickly, when you're a  
12 Chief of Staff of the Agency -- I don't know if  
13 this is the same in every state government -- but  
14 Chief of Staff, the Governor's team would end up,  
15 you know, you ended up being responsible. They  
16 treated the principal, particularly someone who,  
17 like, Howard, who was very close with the Governor  
18 as if, you know, he was a kid to bring around and  
19 it was my responsibility to corral him.

20 And that was -- that also became a  
21 job and it became, you know, the substance policy,  
22 the substance of announcements didn't end up going  
23 to him, they ended up coming to me. So I started  
24 to have a very clear reporting, you know, dotted  
25 line to Chamber primarily through their press

1 L. Boylan

2 components.

3 Q. So who are the people in Chambers  
4 that you dealt with primarily?

5 A. At first, it would have been  
6 underling like -- not underlings, but people like  
7 Dani Lever, Annabel Walsh, Jill DesRosiers,  
8 Stephanie Benton and ultimately Melissa DeRosa,  
9 but Melissa would only get engaged somewhat later.

10 Q. Around when did you --

11 A. And Andrew Ball.

12 Q. Around when did you start having more  
13 contact with Melissa DeRosa?

14 A. I remember -- the first thing I  
15 really remember about her when was she became  
16 secretary to the Governor -- and again, I don't  
17 have dates. Primarily when I have dates, it's  
18 because I know what the event was and I look back  
19 at the date, so just fully candidly speaking.

20 But I was invited to a campaign event  
21 where she was being celebrated as the first woman  
22 secretary to the Governor. I remember being so  
23 proud because I went to a women's college and it  
24 was really important to me that we get women in  
25 these leadership roles and so I sent her an email

1 L. Boylan

2 and sent her a few nice things and then I think I  
3 was kind of on her radar as well.

4 And when they were trying to get paid  
5 family leave and the \$15 minimum wage passed, that  
6 was my first real interaction with her. So I  
7 could figure out the date time stamp for that  
8 because the job of -- the Governor's team and the  
9 relevant agencies was to get these things passed  
10 and I connected -- I was the person connected with  
11 the business community, so I was to try and corral  
12 support from the Chambers of Commerce across the  
13 state and our regional directors and, you know,  
14 get validators for both the \$15 minimum wage and  
15 paid family leave.

16 So that was my first interaction with  
17 her because it was a very high profile goal of the  
18 Governor and as you can imagine, small employers  
19 were probably the most concerned about both of  
20 these changes, so I ended up interacting with her  
21 a lot and that was my first brush with the  
22 disrespectful environment because she was very  
23 disrespectful. First, she was very nice and then,  
24 you know, very disrespectful pretty quickly.

25 Q. When you say he was disrespectful,

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2 what do you mean by that? Can you give me some  
3 example?

4 A. Yelling on the phone, you know,  
5 when -- you know, she's a press person, not a  
6 substance person. To try and explain to someone  
7 why a small business is concerned about the cost  
8 of paid family leave and \$15 minimum wage, she  
9 wasn't interested in the, you know, the nuances or  
10 challenges of reality. She's just interested in  
11 the title and the -- so we immediately, you know,  
12 I think through that first experience I knew, you  
13 know, we were not going to be great allies, which  
14 is what I always look for in women.

15 Q. How often did she, you know, yell on  
16 the phone?

17 A. It was very limited because again  
18 this was just a very high profile both those  
19 initiatives of the Governor. She didn't get  
20 engaged unless it was kind of something that was  
21 like her baby, so to speak. Right? And that was  
22 my first and limited interaction. Then it wasn't  
23 really until I was -- at a certain point, Howard  
24 stopped being the person answering questions to  
25 the administration about things and fixing

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2 problems and all of that or getting, you know,  
3 removing, you know, staff that weren't working.

4 All of these things, all of the  
5 problem solving and all of the policy and all of  
6 the press announcements stopped going to him and  
7 they started going to me. When that started  
8 shifting over, then I started interacting with her  
9 and that entire team more and it also coincided  
10 with when the Governor became aware of me.

11 Q. Okay. We're going to come to that.

12 During the time you were Chief of  
13 Staff, did you socialize with anyone in the  
14 Chamber?

15 A. I wanted to because there was, like,  
16 this clique of young -- of women and it was very  
17 mean, all of those women I mentioned. And I  
18 thought if they could see that I was a real  
19 person, maybe they would be a little bit nicer and  
20 accepting of me and I didn't understand why I  
21 couldn't make it work. I went to a women's  
22 college. I care more about women succeeding than  
23 anything. So yeah, I made a real effort and I was  
24 just never gonna be -- I think like most women --  
25 most people -- I was never gonna be accepted.

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2 Q. What did you do to try to socialize  
3 them and get to know them?

4 A. I mean, the email that you have with  
5 Stephanie Benton. You know, I would say things  
6 like "I hope to get to see you after work one of  
7 these days." Try and -- you know, I was the -- I  
8 was the only person [REDACTED] in any of these  
9 circles, so, you know, I was artificially -- I  
10 don't want to go out, I don't want to do these  
11 things, I don't want to be part of the scene, but  
12 I want to be accepted so that this working  
13 environment can be less negative for me.

14 So it would be stuff like that, like  
15 the email that you saw with Stephanie where it was  
16 like "Thank you for this, I hope to see you after  
17 work one of these days." You know, that kind of  
18 thing. And it was pretty consistent because,  
19 like, I don't care if I'm embarrassing myself,  
20 [REDACTED]. I  
21 don't give a shit. I just want to have my work  
22 life be better.

23 Q. Did they ever take you up on your  
24 offers to get together?

25 A. No. Always after big campaign events

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2 ultimately and big programmatic things, there  
3 would be people out and about and I would always  
4 try to be a part of that so that maybe they would  
5 accept me and I think really most women who were  
6 outside of the circle did that and it just never  
7 happened.

8 Q. When you were Vice President, where  
9 was your office located?

10 A. On the 36th floor. Yeah, 36th floor.  
11 I first had a small office that faced north and  
12 then I got a corner office, which was my former  
13 boss, [REDACTED], office once -- you know, he  
14 left. And this is the only agency where the  
15 office -- the agency is just below the Governor's  
16 offices and you know -- you probably know there  
17 are these back stairwells and the pass that swipes  
18 you in, so it's a very different dynamic than any  
19 other agency.

20 Q. And this is at 633 Third Avenue?

21 A. Yes.

22 Q. How many floors did ESD have?

23 A. I think we had a little bit of -- we  
24 had 35, 36, 37 and I think we had a little bit of  
25 34, but increasingly and, you know, there's been,



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2 you know, news stories about that, the Governor's  
3 Chambers would take additional space. So it was  
4 always a fight for ESD to keep space, so, you  
5 know, the Governor's team was encroaching on spots  
6 all around on all of these floors.

7 Q. Which floors was the chamber on?

8 A. Well, the Governor's office I want to  
9 say is on 38 and his is on 39, if I remember  
10 correctly. I could be wrong. This is my best of  
11 my recollection.

12 If you were really senior, you would  
13 be on the same floor as the Governor. It was,  
14 like, a message, like, on 39. And then everyone  
15 else was on 38 and then if you really weren't, you  
16 know, part of things, you would be on the ESD  
17 floors.

18 Q. When you became Chief of Staff, did  
19 you -- is that when you moved to the corner office  
20 or did you move offices again when you became  
21 Chief of Staff?

22 A. This was when I moved to the corner  
23 office.

24 Q. How did you come to work in the  
25 Executive Chamber?

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2 A. I had been asked -- I mean, the  
3 Governor, when he identifies someone that he  
4 likes, you're pretty much asked pretty  
5 consistently. So I'd been asked, you know --  
6 like, I don't even remember the first time when I  
7 was Chief of Staff -- to move over and I just  
8 didn't -- you know, I was afraid of those people.  
9 I was very afraid of them and the environment and  
10 him without some kind of protective barrier, so I  
11 think on numerous occasions I was asked to come  
12 before I actually did.

13 Q. Who asked you on those occasions when  
14 you declined?

15 A. I could never really decline. I  
16 would say things like "I can do everything that  
17 you want me to do from here." You can't -- I  
18 remember one time I said no or, you know, the  
19 Governor said "How do you think my speech went?"  
20 I said "Well, I thought this was good. I thought  
21 you were kind of folksy on this front" and, like,  
22 he wouldn't let it go for, like, two hours and it  
23 was a very negative experience. You learn very  
24 quickly you can't say no. You just try and, you  
25 know, gloss over something and disappear before

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2 it's time.

3 So the Governor directly would make  
4 overtures for me to move there and then he would  
5 have Melissa follow up about it and she was  
6 ultimately the one who, you know, made the offer  
7 for me to come and that in itself was a weird  
8 dynamic.

9 Q. Tell me about the conversation where  
10 she made the offer to you.

11 A. You know, I always really wanted her  
12 to accept me because life was hell if these women  
13 did not like you and why would I want to work in a  
14 hellacious environment. And she called me and she  
15 said let's make a deal, you know, you're going to  
16 come -- I have to -- I have to get the deal done.  
17 Basically he tells people "Do this, make it  
18 happen."

19 She didn't really talk about anything  
20 on the phone. She just said, you know, you're  
21 going to come work for me and -- us -- and, you  
22 know, how are you going to deal with Howard. And  
23 at first, I think there were early on in times I  
24 would try to say like, well, I don't think Howard  
25 -- you know, I think that would be really

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2 problematic.

3 And ultimately, she called me I think  
4 one morning at, like, 8:00 a.m. because that's  
5 when they have their staff calls and I started  
6 joining their staff calls even before I moved over  
7 officially. I was kind of halfway in Chamber for,  
8 like, two years frankly.

9 I think she would ask me where I got  
10 my blowouts and then she kind of said okay, well,  
11 we're going to work it out and there were a few  
12 challenges that I had because they were talking  
13 about titles and I said well, you know, like,  
14 someone is in this job now. I don't want the  
15 same -- why would I want to, like -- and I tried  
16 to kind of, like, be logical about it and there  
17 really wasn't any interest in logic and it was  
18 just all about the -- you know, she had to get it  
19 done on his behalf.

20 And before that happened, he had been  
21 trying to get me and I used all different, you  
22 know, kind of excuses to try and not go there and  
23 at one point I said "You know, I don't really  
24 think Melissa likes me very much" and I'll never  
25 forget -- I don't remember when this was -- but I

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2 received a call from him after an event and he  
3 sounded really drunk and he said "I talked to  
4 Melissa all about it and she has no problem with  
5 you. She likes you." And that's how I knew,  
6 like, she would really hate me, especially then.

7 So, you know, I kind of knew this was  
8 a very -- like a viper's den when I was going into  
9 it. But I just -- I just increasingly felt like I  
10 didn't have other options.

11 Q. You said there was a discussion about  
12 the title.

13 What title was Ms. DeRosa proposing?

14 A. I think we were going back and forth  
15 because Mike Schmidt was the Deputy Secretary for  
16 Economic Development and I had had a  
17 contentious -- part of the challenge of being in  
18 one of the agencies is that you're trying to push  
19 back against the ridiculousness of Chamber, like  
20 you see probably with the Health Department.

21 So you're kind of trying to defend  
22 your people and your resources from encroachment,  
23 but then also don't make it look like you're  
24 making -- you know, doing that. And so Mike  
25 Schmidt was supposed to be this person who

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2 interacted with me, but that role of the Dep  
3 Secretary -- because Howard didn't like taking  
4 orders from anyone and then it would be left to me  
5 and it was always a weird dynamic, so I didn't  
6 just want his job. I was like I don't want to job  
7 of the person that I hated working with. You  
8 know, like, because these titles mean something  
9 with other people in the administration, so I  
10 don't want to have a hard time in my life. So I  
11 said well, what -- you know, I don't want to just  
12 have the same job that he had and that's when I  
13 was given, like, she texted with me the special  
14 advisor, whatever the hell that means.

15 Q. And did you --

16 A. And I said I didn't -- I said  
17 something about wanting an increase and that I  
18 wasn't going to move my office, like, I wanted to  
19 keep my office.

20 Q. And did she agree to the increase and  
21 to keeping the office and all that?

22 A. She said yeah, fine, whatever about  
23 the office. The increase, there was always these  
24 constraints around, you know, various budgeting  
25 things, so I don't think she said yes to that. I

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2 think I did get an increase of maybe a few  
3 thousand dollars. I don't honestly really  
4 remember.

5 Q. And so was there any further  
6 discussion before you switched from Chief of Staff  
7 to the Special Advisor role?

8 A. Yeah. I had to tell Howard and, you  
9 know, that was really hard because he had been  
10 like a father to me and he just didn't deal with  
11 it very well and it was very difficult because, in  
12 my view, he observed a lot of what was happening  
13 and I thought he was on my side and I don't think  
14 he really was at the end of the day. I think he  
15 was on his own side and he was very selfish about  
16 it and it amazed me that he didn't understand the  
17 fucked up situation I was in on many levels,  
18 having worked for him and being in the dynamic  
19 that it was ultimately and then he sent out an  
20 email -- an all-staff email -- about people  
21 leaving and you would typically send, like, a nice  
22 message and he sent a very childish -- you know,  
23 like I staffed him in all of these things and he  
24 sent a very kind of like rude, emotive, short  
25 thing which was embarrassing because, like, all

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2 the agency that I had overseen and all the hard  
3 work I had done and I said, you know, I think that  
4 was really inappropriate. The good thing about  
5 him was at least I could communicate something  
6 real. I couldn't do that with any of these people  
7 in Chamber and he fixed -- he sent out a nicer  
8 announcement with all three of the women that were  
9 moving on to different roles. But it was not  
10 easy. It was like dealing with a den of small  
11 baby men.

12 Q. Did you tell anyone why you wanted to  
13 keep your office in ESD?

14 A. Yes, [REDACTED] -- I'm trying to remember  
15 her last name. So there was a series of  
16 secretarial staff and the woman -- she wasn't my  
17 staffer, but she was the one who was consistently  
18 placed literally right outside of my office. She  
19 had observed the rose incident where I was brought  
20 a rose down from that and she had observed a lot  
21 of -- anyone who worked around me, including her  
22 and some of the women who worked under me at ESD,  
23 knew that I had to jump and drop everything if I  
24 received a call from the Chamber to deal with it.  
25 So they knew the urgency of that and they also had



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2 some sense that he was -- they never saw him, he  
3 never came, but, like, being had a rose brought  
4 down to you on Valentine's Day, stuff like that  
5 would happen and I said I don't want to go up  
6 there. I would generalize, I would never say  
7 more, but -- one time, the photograph ended up on  
8 my desk and I talked to [REDACTED] I said "[REDACTED]  
9 did you put this on my desk?" because people would  
10 never come into my office and it was on my seat, a  
11 signed picture of the Governor, and I went  
12 outside, I said "Did anyone see someone come? Did  
13 anyone put it here?"

14 So they knew. People like [REDACTED]  
15 I could get her last name for you, she still works  
16 there -- and [REDACTED] and [REDACTED],  
17 they knew that I found it all very creepy at the  
18 same time.

19 But I tried not to -- like, these  
20 were people who worked for me. I wasn't going to  
21 pass on my stress. So I would say this is creepy,  
22 but I never gave any outward impression that I  
23 couldn't handle it.

24 Q. Did you tell anyone that you wanted  
25 to keep your old office because it was a nice

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2 office or anything along those lines?

3 A. Probably. I mean, I like five -- it  
4 was an agency of hundreds of people under me. I'm  
5 not going to tell everyone -- it was a very nice  
6 office. It was an amazing corner office. It was  
7 like in that movie with Goldie Hawn where she gets  
8 the office. No, no, no. Melanie Griffith.  
9 Working Girl. She's finally respected, which is  
10 very ironic.

11 Yeah, I'm sure I told people that  
12 after I left consistently and to this -- you know,  
13 not know, but I would say things -- they'd be like  
14 so what was it like? I'd say well, I worked for  
15 the Governor and I got to -- I think he liked my  
16 work for a lot of good reasons and he liked to  
17 have me for a lot of bad reasons, too, and that's  
18 what I would say.

19 So it was that kind of -- you know, I  
20 would never elaborate, but if people had observed  
21 -- no one really wanted to get close to Chamber  
22 because it's a very toxic scary thing. I would  
23 protect my staff from him. I would protect --  
24 when I became the secretary, I would protect my  
25 agencies from them.

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2 Q. Before you made the official  
3 transition to senior advisor, you said you started  
4 joining the staff meetings.

5 A. Yeah.

6 Q. About how many months before the  
7 official transition would you start joining the  
8 staff meeting?

9 A. I would say sometime in the fall of  
10 2018.

11 Q. Of 2018?

12 A. Yeah. The fall to late 2018.

13 Q. Didn't you leave the Chamber in 2018?

14 A. 2017. Excuse me. My apologies. Not  
15 great with dates.

16 So I became the Secretary --  
17 officially Deputy Secretary -- in early 2017, so  
18 this would have been the months just before that.  
19 Fall to late fall, winter 2017. I'm just not sure  
20 on the exact timing.

21 Q. You said Deputy Secretary.

22 Did you assume the Deputy Secretary  
23 or did you have a Special Advisor title? I'm just  
24 trying to get clarification.

25 A. I had those titles at the same time.

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2 It's just -- the Special Advisor thing is just to  
3 say, like, you're a special senior person. It's  
4 bullshit.

5 Q. How big were the staff meetings that  
6 you started participating?

7 A. They were run by Alfonso David,  
8 Melissa DeRosa, Linda Lacewell, Rich Party, Dani  
9 Lever, Annabel Walsh, Stephanie Benton, [REDACTED]  
10 [REDACTED]. I would say probably 12 to 15 people.

11 Q. Were those weekly?

12 A. Daily.

13 Q. Daily.

14 A. It was a nightmare. It was just  
15 Linda Lacewell and Melissa yelling at people and  
16 then Alfonso starting it and closing it by saying  
17 "This is all confidential."

18 My husband heard one one time and he  
19 was like "I've been in investment banking over 25  
20 years and I've never had someone talk to me the  
21 way that they talk to people."

22 Q. How long did the daily meetings last?

23 A. An hour.

24 Q. Other than joining in the daily  
25 meetings, what other things, if anything, did you

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2 do for the Chamber prior to officially  
3 transitioning over?

4 A. For all intents and purposes, I had  
5 that job before I got to the title. I did all  
6 of -- like, for instance, with the Amazon stuff,  
7 not only did I coordinate my agency's data  
8 collection and the packages that the State put  
9 along with these different bids from New York  
10 City, Long Island -- you know, I'm just trying to  
11 highlight something you would be familiar with  
12 probably -- so that would have been my job as  
13 Chief of Staff of the Agency.

14 But I was also communicating directly  
15 with and giving updates to the Chamber. So that  
16 would typically perhaps have been the Deputy  
17 Secretary's role. But because the Governor and  
18 Howard were so difficult to deal with -- very  
19 different ways, but older, you know, powerful  
20 white men -- I was tasked with kind of connecting  
21 the dots. So I basically had this job. I went  
22 to -- I sat in on scheduling meetings very  
23 frequently which were typically once a week with  
24 the event staff, Stephanie Benton, Annabel Walsh,  
25 Andrew Ball, all the press people.

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2 Pretty consistently -- probably a  
3 year in advance I was doing that pretty regularly  
4 and I would staff the Governor on subject matter  
5 things very early. You never staff the Governor  
6 unless you were a person that was in his sphere.  
7 So even though I was the Chief of Staff, I was  
8 pretty consistently and regularly staffing or  
9 communicating to the Governor. So the title came,  
10 but for all intents and purposes, I was doing a  
11 lot of that work already.

12 Q. You referred to staffing the  
13 Governor.

14 What do you mean by that?

15 A. He, like, for instance, when he flies  
16 to a series of events where he has to make  
17 speeches, when he's going to the event, he'll quiz  
18 people on the details so that he can be prepared  
19 for the speech and what to expect and what it's  
20 going to be like. I was the person who did all  
21 the job creation. So if you see all these job  
22 creations -- 500 jobs at GM, you know, that kind  
23 of stuff -- I was frequently -- Howard would do it  
24 sometimes and they were like two dudes doing it.  
25 I would sometimes join them.

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2 I remember two of the early events  
3 where I was kind of really -- he was aware of me  
4 and I was -- it was turning into me doing some of  
5 the staffing. What was the Gap fire? I don't  
6 remember the date of that. It's, like, a press  
7 announcement, so we could find that.

8 And then the GM plant or the motor  
9 plant in western New York where I actually -- I  
10 think that was the first time I had staffed him  
11 and then you have the email related to that from  
12 Stephanie afterwards.

13 But if you're on the plane with him,  
14 he would sometimes have a subject matter expert, a  
15 press person and then, you know, the State Patrol  
16 person and then him and maybe one other person.  
17 When you're staffing him, it's your job to have  
18 all the information, all the relevant information.  
19 He would quiz you basically to try and, you  
20 know -- he's very masochistic. It would be for a  
21 purpose so that he's prepared, but it was also he  
22 would quiz until you didn't have an answer to  
23 something he was asking.

24 And then he would give his speech or  
25 whatever it was and then he would be much more

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2 relaxed after, you know, either on the flight back  
3 or after the event and you would hopefully get  
4 thanked or you would be in trouble because  
5 something didn't go right and you would hear about  
6 it either from him or from, like, Stephanie  
7 Benton.

8 Q. You said the Governor and Howard  
9 Zemsky were difficult in different ways.

10 In what ways was Mr. Zemsky  
11 difficult?

12 A. Noncommunicative. I mean, like I  
13 thought the Getty woman could get away with what,  
14 you know, white men and old white men in power who  
15 have a lot of money or influence do. I mean, he  
16 would just choose who he didn't want to deal with.  
17 So if there was a problem internally, I was  
18 frequently dealing with the day-to-day.

19 You know, there are bad messages and  
20 stuff like that, but he showed leadership at  
21 important moments and I don't think he's an evil  
22 person like the Governor.

23 Q. You said you were essentially doing  
24 the role before you got the official title.

25 Did your responsibilities change at



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2 all once you officially became Deputy  
3 Secretary/Senior Advisor?

4 A. Yes. I got a whole responsibility  
5 for agencies that I hadn't managed. So I wasn't  
6 just responsible for managed oversight of the  
7 agency that I had come from. I had housing and  
8 community renewal, so Ruth Anne Visnauskas is the  
9 commissioner for that and she's a dear friend. I  
10 think she viewed and people at the housing  
11 agencies viewed me as protecting them from the  
12 Governor and others.

13 I took on oversight of the Department  
14 of State, which unlike in other states, it's  
15 primarily licensing, permitting, stuff like that.  
16 It's not election related.

17 I took over oversight of NYSCA, the  
18 Council of the Arts, which does grants and things  
19 to culture and art institutions and stuff like  
20 that. I took on additional portfolios. I was  
21 doing the same work with more authority, you know,  
22 of my own cone of economic development and  
23 regional economic development, but then I got  
24 these other things.

25 And I also increasingly -- when I was

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2 head of Regional Economic Development, not only  
3 did I run the regional office, but also our office  
4 in Puerto Rico because Zika and all these things  
5 had kind of screwed up the island and ESD kind of  
6 oversaw tourism, so there was, like, a lot of  
7 opportunities where we were trying to help Puerto  
8 Rico.

9 Then after Hurricane Maria, I ended  
10 up overseeing all of the State's recovery work in  
11 Puerto Rico and that was much more direct me  
12 managing all other things once I became Dep Sec  
13 and then I didn't have anywhere to hide from, you  
14 know, all these people. I thought maybe that my  
15 hell would be -- like the experience would be less  
16 toxic when I was inside, but it was actually worse  
17 because there was no buffer. So, you know, like,  
18 these people owned me.

19 Q. And who became worse when you were  
20 essentially formally working for the Chamber?

21 A. Melissa and the Governor. Everyone,  
22 but Melissa and the Governor especially.

23 Q. We're going to come to the Governor.  
24 In what ways did Ms. DeRosa become  
25 worse?

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2 A. She would scream at me. She would  
3 yell at me for illogical things. She was just  
4 really -- she really did not like me and she  
5 really -- I mean, she used to have memes about the  
6 Mean Girls movie and she liked the association of  
7 being that lead mean girl. You know, [REDACTED]  
8 [REDACTED] I'm, like, relatively  
9 dorky. I never wanted to be that. She really  
10 liked -- on her Instagram, she had at some point,  
11 like, herself as the Mean Girl thing.

12 And then at some point when I was  
13 working for her, she, like, yelled at me and she's  
14 like "What the fuck did you do?" She called me in  
15 my office and I said "I'm not dealing with this"  
16 and I hung up the phone on her. I knew after that  
17 she, like, deleted me on her Instagram and  
18 Facebook and all this shit. So I knew that -- I  
19 knew was screwed with her. But, you know, I ...

20 Q. Do you recall when the incident was  
21 when you hung up on her relative to when you left?

22 A. It was shortly before the text  
23 exchange you have where she said "I know it was a  
24 tough day and we all want you back here." Because  
25 I tried to quit, like, three times and that was

1 L. Boylan

2 one of those times where I, like, just left.

3 Q. We'll come to that in a minute.

4 You said you interacted with Andrew  
5 Ball.

6 What type of things did you interact  
7 with him on?

8 A. It was all about events. He was the  
9 person, you know, in the office tour that I got  
10 and that was earlier on, but it was a pretty  
11 seminal moment in my realization of the  
12 environment. And he was the one who would be  
13 calling me. I mean, Governor's -- he did a lot of  
14 the Governor's dirty work sometimes. Like he  
15 would call people and yell at them. I didn't get  
16 yelled at because the Governor liked me, but I  
17 would be called to the offices by him or, you  
18 know, he would always be kind of watching.

19 Q. If you could turn to tab three in the  
20 binder --

21 A. I don't know what this relates to.

22 Q. Well, so this is an email from you to  
23 Andrew Ball on March 5th, 2017. It says "I'm  
24 afraid to go to sleep."

25 You don't recall --

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2 A. Like I was afraid of a lot of my time  
3 there. But I honestly have no specific -- I mean,  
4 it was -- I can't even verbalize what a fucked up  
5 environment it was, but I have no idea of the  
6 specific candidly, I have no idea what this one  
7 was about.

8 Q. If you could turn to the next page,  
9 tab four, there's an email from you to [REDACTED]  
10 Staffer #5 (phonetic) October 23rd, 2017.

11 A. Yeah. I mean --

12 Q. It says -- first of recall, who is  
13 [REDACTED]

14 A. He sat right outside the Governor's  
15 office.

16 Q. Do you recall why you wrote "You  
17 okay?" to him?

18 A. No. I mean, but it was a terrible  
19 environment and I felt like -- [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED] and a lot of stuff was passive  
23 aggressive, so I would try -- [REDACTED]

24 [REDACTED]. I felt like I should  
25 try to see if people were okay and I'm sure he was

1 L. Boylan

2 having a hard day. I mean, he took a lot of shit  
3 from the Governor.

4 Q. In what ways did you observe the  
5 Governor giving him a hard time?

6 A. I didn't observe it as directly with  
7 him, but he would yell out the door at anyone  
8 there. And having a good relationship with the  
9 person right there or the person who runs the  
10 Governor's schedule was helpful because maybe they  
11 could give you a heads up if you were going to get  
12 a random call with 15 people in the room. You  
13 know, but I -- it was never okay. It was always a  
14 terrible environment for everyone, whether they  
15 were sexually harassed or not.

16 So I don't know what this is.  
17 Everything was terrible. I can't even -- I don't  
18 even know what this is. I don't know what this  
19 is.

20 Q. Did you ever make comparisons between  
21 the Chamber and The Devil Wears Prada?

22 A. I'm sure I did.

23 Q. To whom do you recall making such --

24 A. Rob was one of the few people that I  
25 thought was a really good person. I've since seen

1 L. Boylan

2 how he's kind of handled things, but he was one of  
3 the few people I thought that was a decent person.  
4 So I was trying -- like when you're in an  
5 environment that's so terrible, you want to find  
6 someone who is going to be, like, we both see the  
7 same things. That's why it's great to have  
8 siblings if you have, like, a toxic family, but he  
9 was nice.

10 Q. When you say Rob, that's Rob Mujica?

11 A. Yeah. He was nice to me.

12 Q. Why did you think that the Chamber --  
13 in what way did you think the Chamber --

14 A. Not -- Melissa -- well, actually no.  
15 It might have been the Governor, too, because he  
16 has a certain temperature, it's terrible and  
17 toxic, but -- you know, to be clear, I worked in  
18 New York and I didn't have any connections here.  
19 I came up in my career in very toxic environments.  
20 I've never experienced anything like this place.  
21 So, you know, I would send stuff all the time.  
22 Like I was so -- trying so hard to make something  
23 out of this place for me and I didn't consider  
24 failure an option and I didn't -- not only did I  
25 not consider that an option, but if you leave

1 L. Boylan

2 work -- you're not even allowed to leave. Alfonso  
3 David wasn't allowed to leave for the longest  
4 time. I don't know what he finally did to be able  
5 to leave to get that job at the LGBT organization,  
6 but you're not allowed to leave.

7 Q. We'll get to him in one second.

8 What was Mr. Mujica's position?

9 A. He was the budget director.

10 Q. Do you recall any particular incident  
11 that led you to compare the Chamber to The Devil  
12 Wears Prada to him?

13 A. I mean probably every day of my  
14 employment.

15 Q. What do you know about Mr. Alfonso  
16 David trying to leave the Chamber?

17 A. I don't know. I just know that  
18 everyone was unhappy there and wanting to die and  
19 finally he got out. I don't even know the story.  
20 We're not friends, I don't really trust him, I  
21 don't think he's a good person. You literally  
22 don't get to leave.

23 I remember sitting in the airplane  
24 with Dani Lever and the Governor and she was  
25 talking about going to grad school in something



1 L. Boylan

2 and I was saying well, I have some friends, I  
3 could connect you to blah, blah, blah or you --  
4 and he was literally like "You don't need to go to  
5 grad school, everything is here that you need."

6 I mean this is a person who views  
7 people leaving as, you know, not like -- if you've  
8 left, it's because you're dead.

9 Q. When you say "he said that," that was  
10 the Governor?

11 A. Yes.

12 Q. Did anyone tell you about Alfonso  
13 David trying to leave the Chamber?

14 A. There was always rumors. I mean Jill  
15 one day left her office -- I didn't see it, but --  
16 I don't know, it's a small world. People would --  
17 I don't know what's true or not, but apparently  
18 she left the office crying and was, like,  
19 non-responsive for, like, days or a week. The  
20 same year that I tried to quit three times.

21 Q. You said that you didn't trust  
22 Alfonso David and he's not a good person.

23 What's your basis for that opinion?

24 A. He would tell people to delete their  
25 emails. Like I always wondered, like, if I don't

1 L. Boylan

2 have anything to be ashamed of or if there's  
3 always a way to explain something or if, you know,  
4 if I'm not doing anything illegal, why should I  
5 delete an email.

6 Q. Did he ever direct you personally to  
7 delete an email or was this --

8 A. No.

9 Q. -- at staff meetings? Something  
10 else?

11 A. At staff meetings, he would say, you  
12 know, cleanse your -- I don't know. There was,  
13 like, a weird term and it was very -- very weird  
14 and then, you know, which I'm sure we'll get to,  
15 at the end of my time, I thought that the way that  
16 whatever interactions we had were handled was  
17 entirely politicized for reasons behind the  
18 scenes.

19 So, you know, that's my assessment of  
20 it. I mean, you can have a different one, but I  
21 think that he was -- you know, even on things like  
22 the broadband -- there were a few times he was  
23 sent in on behalf of the Governor to fix things  
24 and some things just shouldn't be fixed. Some  
25 things should see the light of day and I remember

1 L. Boylan

2 there was this case with [REDACTED], who had been an  
3 employee at ESD, and some woman -- and I don't  
4 know the specifics of it -- but, you know, the  
5 Governor would always think of him being  
6 responsible for fixing a problem, just like the  
7 others, like Melissa.

8 I think at the end of the day, if  
9 you're going to be really successful working for  
10 him, you're going to fix problems that are  
11 unethical and I think he did that regularly.

12 Q. What was the issue with the [REDACTED]  
13 and an employee?

14 A. I was not directly engaged in it at  
15 all. I just heard about it on the plane primarily  
16 one time when Alfonso and the Governor were both  
17 on and it was mentioned a few times on our staff  
18 call. But he had had an inappropriate  
19 relationship with a woman who worked at a  
20 different agency -- not at ESD -- and he had  
21 promised her some things and whatever soured on  
22 that interaction, she sent it to, like, some  
23 independent investigation so it never even went  
24 through ESD, it went through, like, the state  
25 and -- I don't even know. Some apparatus that was

1 L. Boylan

2 kind of like an ombudsperson office. Ultimately,  
3 that meant that Alfonso was dealing with this and,  
4 you know, there's that.

5 There was also a time during the  
6 broadband roll out. They have things called  
7 reverse auctions, you know, for bidders and I  
8 don't know the specifics of it, but I remember  
9 hearing in one case that he, like, came in the  
10 dynamic with the broadband manager who was at ESD  
11 to, you know, fix a challenging situation with one  
12 of the unions and I didn't know the specifics of  
13 it and I wasn't welcomed into the conversation,  
14 but I never -- I never really think that the way  
15 that he and his closest -- you know, you see it,  
16 fixed the Department of Health report fixed the  
17 blah, blah, blah. When we were trying to release  
18 our annual reports at ESD, he and Melissa would  
19 approve whether or not we could send it out and  
20 for years, we didn't get to send out a report, so  
21 by the time we did, it looked very bad.

22 So he was always ultimately fixing  
23 things. When you fix things for a deeply corrupt  
24 person, you're going to get dirty and I think he  
25 is an unethical person. But it's neither here nor

1 L. Boylan

2 there.

3 Q. Do you know what he did to fix the  
4 situation with [REDACTED] and the female employee?

5 A. I don't know and I wasn't apprised of  
6 it. You know, I was -- I try to think like how I  
7 stayed there so long. I think I tried to just  
8 stay in my lane and I was so wanting to be  
9 accepted in this toxic environment and it was even  
10 more toxic because if he wasn't happy with me,  
11 then I got shit from all of these women around him  
12 and if he was happy with something I had done or  
13 said, I got shit from these women around him  
14 because they didn't like that I was somehow  
15 invading, encroaching on their space.

16 So it was just a -- I didn't have the  
17 capacity and I didn't have -- like you're told  
18 "You stay in your lane."

19 Q. When you talked about whether he was  
20 happy or not happy, you're referring to the  
21 Governor?

22 A. What?

23 Q. When you talked about whether he was  
24 happy or not happy, you're referring to the  
25 Governor?

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2 A. I don't think he cared about my  
3 dynamic with the Governor. I think he did what he  
4 was told with the Governor. I think that the  
5 woman were used to feeding other women to the  
6 Governor as per your finding, so the women, I  
7 think, didn't like me. I don't think Alfonso  
8 cared one way or another. I just think he's an  
9 unethical person.

10 Q. I'm sorry. I'm just trying to  
11 clarify something.

12 You said the women would react one  
13 way if he was happy with you and also act badly if  
14 he wasn't happy.

15 When you're talking about being  
16 happy, that's the Governor, right?

17 A. Yes.

18 Q. I just wanted to clarify that.

19 Let's talk about the Governor.

20 When the first time you met the  
21 Governor?

22 A. First time I remember -- the first  
23 time I met him totally, you know, separate, he  
24 wouldn't have remembered me or whatnot, but Rich  
25 Bamberger was staffing him. He received the

1 L. Boylan

2 Public Servant of the Year at Columbia Business  
3 School's annual dinner. He gave a speech. I was  
4 a student at the time, I think, or a grad and I  
5 was at the dinner, too, and since I was one of the  
6 few people in business school who wanted to go  
7 into government, I waited afterwards and said  
8 hello to him. And I did hear from Rich Bamberger  
9 the next day -- this is when I was at Municipal  
10 Finance at RBS and I knew Rich. He said the  
11 Governor said "Why can't we get more people like  
12 that?" and at the time, I thought it was just like  
13 oh, a person with an MBA, but, you know, in  
14 hindsight, it's probably why don't we have more  
15 woman that look a certain way because I have a  
16 certain type kind of thing.

17 So that was my first interaction with  
18 him, but I don't know that he'd remember it  
19 because he's creepy with lots of women daily.

20 Q. At the event at Columbia, did he hug  
21 or kiss you?

22 A. No. There were a bunch of people --  
23 no, he didn't. I mean, he paid attention to me,  
24 which I didn't interpret in a negative way at the  
25 time.

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2 Q. When's the next time you met the  
3 Governor?

4 A. The next time I recall interacting  
5 with him was at this announcement, which I  
6 referenced in the Medium piece at MSG, Madison  
7 Square Garden. I don't know the name offhand or  
8 the time or date offhand, but I know we've gotten  
9 it based on what I shared and he was giving a  
10 presentation, as was Howard. I was the new Chief  
11 of Staff and I went up to the front, you know,  
12 because if you grew up in a family where you don't  
13 have any contacts, you always gotta be like hi,  
14 I'm Lindsey, I toot my own horn, I'm here, duh,  
15 duh, duh. I went up to the front because he was  
16 talking to people and I wanted to say I was the  
17 new Chief of Staff and that was the first  
18 interaction where it was too long and it was kind  
19 of mystifying how much time he spent with me.  
20 That was my first --

21 Q. How much time did he spend with you?

22 A. Not much. But when you're in a line  
23 of people, it's clear when you're focusing in on  
24 one person versus another.

25 Q. Did he touch you at all in that first



1 L. Boylan

2 interaction?

3 A. Yeah. He does this weird handshake  
4 where he grasps -- he has these massive hands and  
5 he grasps both sides of your hands, which sounds  
6 like nothing, but it's -- it's a power thing.  
7 It's, like, he has these massive hands and he's  
8 wrapping his hands around both sides of your  
9 hands. Like why does he need to envelope me with  
10 his hands? And that was a little weird and it was  
11 weird because he was doing this in front of -- we  
12 had just finished the event and it was in front of  
13 tons of cameras and I just thought -- you know, I  
14 just thought it was kind of -- especially in  
15 hindsight, I think maybe part of it was, in  
16 hindsight, how little concern he had for acting  
17 inappropriately in front of camera or being kind  
18 of, like, creepy in front of the camera.

19 Q. This handshake you describe where his  
20 hand was on both sides of your hand, did you see  
21 him shaking other people's hands that way or was  
22 it just you?

23 A. Just me. I mean, I have seen him do  
24 that. It's not overtly sexual. I think it's a  
25 power play.

1 L. Boylan

2 Q. Have you seen him do it to women and  
3 men?

4 A. You know, when he's not focused his  
5 attention on you -- it was such a stressful  
6 environment to be on. [REDACTED]  
7 after having to fly with him. When his attention  
8 went somewhere else, you would start to breathe  
9 again. So at least me. So I didn't really focus  
10 on consistently how he dealt with other people,  
11 unless they told me.

12 Like my husband told me he was  
13 weirded out by the handshake he got on the Second  
14 Avenue subway evening opening in that case. But,  
15 like, the way he came up to me at that event, I  
16 was kind of overwhelmed by the attention right in  
17 front of all these cameras, which was weird and  
18 then he went away and I'm kind of like what do I  
19 do with this, how do I smile and look normal and  
20 then my husband told me it was weird, but then I  
21 didn't watch them really have that interaction if  
22 that makes sense.

23 Q. Now, you're talking about the Second  
24 Avenue subway event?

25 A. Yes. It skips around related to the

1 L. Boylan

2 kinds of situations that I was in.

3 Q. We'll come back to that in a second.

4 You mentioned his large hands.

5 Did the Governor ever talk about the  
6 size of his hands?

7 A. No. He alluded to -- yeah, I've  
8 heard that. He would make comments similar to  
9 that. When I saw in the paper that Charlotte said  
10 he talked about that, I immediately remembered the  
11 incident with the dog, which I don't think we have  
12 talked about as a group, which is where he said if  
13 I were this -- my dog, his aggressive dog, he  
14 would mount me. Because it wasn't until I read  
15 that that I remembered oh my god, this isn't the  
16 same thing, but it's kind of the same thing where  
17 he would use a symbol to show that he's, like, a  
18 big guy, whether it was his hands, his physical  
19 presence. He would talk about getting girls, he  
20 would even go back and forth with Howard and that  
21 always made me uncomfortable. Fucking more so now  
22 the more I think of it.

23 But I never heard the hands thing,  
24 but as I said, that's the exact same thing as him  
25 saying -- because his dog was scratching me, his


1 L. Boylan

2 creepy weird wolf dog, and he is climbing on me  
3 and he says "Well, if I was the dog, I'd mount you  
4 too." You know, it's kind of the same genre.

5 Q. Where was the incident with the dog?

6 A. In the Governor's mansion. This was  
7 late in my time, near the end of my time.

8 Q. What part of the mansion were you in?

9 A. So there's like -- it looks like a T  
10 when you come into the main building, there's this  
11 main foyer, there's little rooms on either side  
12 and then there's a main hallway where a lot of  
13 events are hosted. And if you've seen the picture  
14 , which  
15 was everywhere, they're on the left side, I  
16 believe, in that main foyer area. We were right  
17 kind of in that central part of the main foyer,  
18 kind of in front of the kitchen area.

19 The dog would come out and maybe  
20 somebody would let him in and he'd start climbing  
21 on me. I love animals, so I was glad to see him,  
22 but then he scratched me and I started to bleed a  
23 little bit and I was like this is all weird. He  
24 has a weird dog that's as aggressive as he is, I'm  
25 thinking.

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2 But I always looked normal. Like I'm  
3 thinking these things, but -- you know, one thing  
4 just to, like, provide the context of the place,  
5 even at the pool events and even at his own  
6 events, he would have photographers not just take  
7 pictures of the audience but of his staff to see  
8 how we were looking at him and how we were acting  
9 and how we looked, how we were dressed. So, you  
10 know, so I was acutely aware that I was always  
11 being watched and I don't think from the outside  
12 it would always be -- you know, I don't think I  
13 presented until I told someone or in the moment  
14 how bad it was.

15 Q. The incident with the dog, was anyone  
16 else present?

17 A. There were other people there. I'm  
18 not entirely sure who they are. I don't -- I have  
19 all these -- the playing strip poker thing. I  
20 know that Abbey was right at -- now she's married,  
21 I don't remember her name. She was right next to  
22 me because I was trying to act in a way as a  
23 younger woman that she would -- that I would  
24 protect her. So I remember her sitting there. I  
25 don't remember if someone else was in the other

1 L. Boylan

2 plane seat.

3 Similarly, I don't remember for sure  
4 who was around in that dog event. I believe it  
5 may have been after either a meeting with Tesla or  
6 after a meeting with some folks from the united  
7 Arabs Emirates. Either one of those things would  
8 have been on a business development deal and  
9 that's why I would have been there, but frequently  
10 Rob Mujica was there, so he could have been there,  
11 but I'm not sure. I just vividly remember me, the  
12 dog and the Governor and either some staff around.

13 Q. What, if anything, did you say in  
14 response to the Governor saying the comment about  
15 mounting you?

16 A. I think I kind of would laugh  
17 awkwardly or something. I don't even know.  
18 Things were so far gone past appropriate at that  
19 point and there was no reaction to his deeply  
20 inappropriate things and I didn't want to create  
21 problems for myself and I didn't know what to do,  
22 so I would just try and not react.

23 Q. Had you ever been to the upstairs  
24 part of the mansion, second floor?

25 A. One time.

1 L. Boylan

2 Q. When was that?

3 A. We were planning -- the front office,  
4 we were -- Rob and Pete and I had to go there -- I  
5 think it was on a weekend, I don't really know for  
6 sure -- for a meeting about Puerto Rico because  
7 [REDACTED], Rob was very  
8 smart and followed through with things, he and I  
9 were frequently paired on stuff and I was leading  
10 the Puerto Rico recovery work.

11 And I remember feeling -- I read the  
12 groping thing and I assumed she was in that room.  
13 I remember feeling very afraid and [REDACTED]

14 [REDACTED]  
15 [REDACTED] [REDACTED]  
16 [REDACTED]

17 I remember turning really red because  
18 something about the environment where I was there  
19 at that moment was very scary and I felt afraid,  
20 like something was going to happen. It's just a  
21 feeling, but I think -- I want to say, like, maybe  
22 there was another door and I kind of feel like  
23 maybe it was his bedroom and it felt like a weird  
24 place to be in the house because I felt like you  
25 only go to the second floor -- Senior Staffer #1 was always

1 L. Boylan

2 coming out of the second floor. I mean, it's  
3 my -- part of the dynamic here is that I believe  
4 with every fabric of my being that [REDACTED]  
5 [REDACTED] and when someone that  
6 senior presents such an inappropriate dynamic,  
7 it's even scary to be around.

8 So she would constantly be coming  
9 down from the second floor when we were at events.  
10 But I never had been up there, except when I was  
11 asked for this one meeting and something about the  
12 dynamic in that room and he came around to look at  
13 something and I just became very nervous and then  
14 I got to leave. But it was a very scary --  
15 women -- you know, I'm an urban planner. In  
16 public spaces, women are much more cautious about  
17 where they are and the nonverbal space cues and  
18 there was something very wrong about that space.

19 Q. Was this an office right off a  
20 hallway or was there --

21 A. You come up the stairs and then that  
22 linear hallway I was talking about on the lower  
23 level, there's something kind of similar up there  
24 and I think it was to the right. It's the front  
25 of the mansion. This window looks basically where



1 L. Boylan

2 the security box is and I think that's his office.  
3 It was a big desk and there's an office. I kind  
4 of feel like his bedroom was right there and I  
5 don't remember specifically, but it felt like I  
6 was in a private space and he was always trying to  
7 blur these lines and I really feel like if I had  
8 stayed there much longer, I would have had a  
9 similar interaction to the staff woman that it was  
10 a constant moving the benchmark of  
11 inappropriateness.

12 Q. When you were in this office, was the  
13 door to the hallway open?

14 A. No.

15 Q. Do you recall what kind of door there  
16 was? Was it a swinging door? Sliding door?  
17 Something else?

18 A. Real door. It was like a real door  
19 that was shut. I remember it vividly because when  
20 I read that groping thing, I don't know that  
21 that's where she was, I kind of felt like that's  
22 where she was. I felt nauseous there and I felt  
23 sick and I felt afraid and I wondered why I would  
24 feel afraid if I knew that Rob was there, but I  
25 still felt afraid.

1 L. Boylan

2 Q. You said you thought the bedroom was  
3 right there.

4 Was there a door to another room in  
5 the office?

6 A. I'm looking back out at the front  
7 door of the mansion, there's a big window, there's  
8 a desk, if you look at that window, you look down  
9 at the front of the mansion and you see the State  
10 Patrol person. I didn't see all those things, but  
11 I'm just trying to orient you as to where he was.

12 A big desk and then there's another  
13 door right here and I want to say that was his  
14 bedroom. Something about what I was seeing was  
15 indicating that and that door was open, but the  
16 door behind it was closed and that freaked me the  
17 fuck out. I don't know why, but it made me  
18 afraid.

19 Q. So the door to the other room you  
20 think is the bedroom was open?

21 A. Yes.

22 Q. Was that a regular swinging door or  
23 was that a sliding door?

24 A. I don't know.

25 Q. I think you mentioned that sometimes

1 L. Boylan

2 the Governor would go back and forth with Howard  
3 Zemsky about girls.

4 What are you referring to about that?

5 A. One time I don't remember the context  
6 of what I was saying. I said something -- I was  
7 in a meeting with Melissa and other people and I  
8 would have to constantly translate Howard because  
9 he was kind of difficult in his own way like a  
10 prima donna and I don't remember what I said, but  
11 I said something about Howard and the Governor in  
12 front of an entire room of people somehow turned  
13 it into oh, did Howard get some -- is he getting  
14 girls pregnant or something like that and it had  
15 nothing to do with what I had said.

16 And, you know, that whole dynamic  
17 is -- [REDACTED]  
18 [REDACTED]. I just -- like he's just  
19 very fucked up and it was a weird thing for him to  
20 say and sometimes when they would play -- the  
21 banter of two government or politicians in public  
22 speaking is to kind of -- they make fun of each  
23 other and that would either continue or escalate  
24 on the plane before or after. Like they would go  
25 back and forth and he would constantly be making

1 L. Boylan

2 fun of Howard.

3 I mean in the same way that he would  
4 kind of occasionally ask me about my husband or he  
5 would ask [REDACTED] SS #4 about her boyfriend. You  
6 know? Stuff like that. I think he would -- and  
7 it was a weird dynamic.

8 Q. Other than the example that you just  
9 gave, any other instances that you recall of the  
10 Governor saying something to Mr. Zemsky of sort of  
11 touching upon sexual issues?

12 A. You know, I always thought Howard was  
13 better person, I think, than he is, but he's not a  
14 bad person like the Governor. But I constantly  
15 had the feeling with both him and the Governor or  
16 Rob and the Governor or any of these other old  
17 white dudes that worked in state government, close  
18 to the Governor, that when I walked up on a  
19 conversation as a woman, like I had just been  
20 talked about. That was how it was.

21 Q. What was it that gave you that  
22 feeling?

23 A. I just know.

24 Q. Did they stop talking or -- you know,  
25 what was the sort of --

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2 A. Yeah, and actually the Governor would  
3 make fun of [REDACTED], too, like him dating girls, too.  
4 And he would kind of continue that in front of me,  
5 like who could get more girls. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED], too. So, you know, he's more  
9 like ...

10 Q. What sort of things did the Governor  
11 say to [REDACTED]

12 A. About getting girls. You know, like  
13 joking about oh, you're dating all the girls in  
14 the building. Stuff like that. I don't know the  
15 language. I'm too awkward to even, like,  
16 verbalize. It was always, like, this  
17 continuation. I went to women's college. I  
18 literally don't know how to speak like men like  
19 this. But literally when you come on a  
20 conversation and you know that you've just been  
21 talked about and they would talk about women that  
22 way.

23 They would describe women, how they  
24 looked, like the [REDACTED]

25 [REDACTED], we were going to the

1 L. Boylan

2 event, I think they announced data and I worked on  
3 the job creation there and I had to, like, pitch  
4 it to him, the Governor was there, Howard was on  
5 the plane, going back and forth, and he was saying  
6 oh, she's so ugly, she's probably a dyke or  
7 something like that. He said something like that.

8 You know, women were always judged on  
9 how attractive they were and if they were skinny  
10 or if they were fat and if they were -- if they  
11 were attractive or if they really weren't, then  
12 maybe they were, like, a lesbian or something.

13 Q. It was the Governor who made that  
14 comment?

15 A. Yeah. He would say that SS #1 is  
16 too skinny. He would say that in front of our  
17 whole staff.

18 Q. What was the name of the executive  
19 that he said was so ugly she must be a lesbian?

20 A. I don't know if he said those exact  
21 words, but, you know, the context of what he said.  
22 I don't remember her name. [REDACTED]

23 [REDACTED]  
24 [REDACTED]. I think it's like [REDACTED] or something  
25 like that.

1 L. Boylan

2 Q. What other comments do you recall him  
3 making about women's appearances?

4 A. Constant. Every woman was judged by  
5 her appearance. The woman who's now his [REDACTED]  
6 [REDACTED] he wanted her to come work for him  
7 because he thought she was hot and, you know,  
8 effective. He would use -- he described me in the  
9 same way that he sometimes described SS #1 [REDACTED],  
10 which is one of the ways I also knew why she,  
11 like, hated me. He would say, like, "You're a  
12 star because you're good at what you do and you're  
13 also attractive."

14 Q. How often did he make such comments  
15 about you?

16 A. Regularly.

17 Q. Every week? Every day?

18 A. Every week. He would look at you.  
19 Like the woman, Melissa McGrath, who said he  
20 looked down her shirt. He would constantly look  
21 at my legs.

22 Q. Did he ever make any comments about  
23 your legs?

24 A. Yes.

25 Q. What sort of comments do you recall

1 L. Boylan

2 him making about your legs?

3 A. I don't know. Like I just know that  
4 it was very clear to me that he liked them. I  
5 couldn't describe exactly the language that he  
6 used offhand.

7 But he would also try to embarrass  
8 and shame and humiliate you. I remember when I  
9 read that Charlotte said that he made her sing  
10 that, like, Irish song. I remember he's, like, a  
11 big baby on his birthday. He has all these  
12 campaign events and I said -- you always wanted to  
13 be on his good side, so I was going to say happy  
14 birthday, thank you so much for including me in  
15 this, blah, blah, blah, blah. I remember one time  
16 he called me and he asked me to sing him happy  
17 birthday and I don't sing. I have the worst voice  
18 in the fucking world. So, like, I really don't  
19 sing. I never sing for my husband or anything  
20 like that. And he wasn't joking. He didn't get  
21 off the phone until I sang and it was embarrassing  
22 and in a way I feel to make you feel so humiliated  
23 that you were stuck there.

24 Q. Any other times that he made you  
25 sing?



1 L. Boylan

2 A. No. He probably thought my voice was  
3 terrible after that. I mean, the rationale  
4 here ...

5 Q. Did you ever hear him ask anyone else  
6 to sing or insist somebody else sing something?

7 A. No. That was his light -- I would  
8 say that was his if-he-liked-you toxicity. For  
9 most people, when you're around, you saw the  
10 if-he-hated-you toxicity. The interactions that  
11 I've read about and that I've heard about from the  
12 other women, those always all happened primarily  
13 alone. Right?

14 So I would be asked to come to a  
15 meeting about something alone and then he would  
16 ask that we move to sit in, like, in his New York  
17 City office, he had his desk, his massive phallic  
18 desk, and then he had this couch and chair in the  
19 back and on more than one occasion, he would ask  
20 that he and I sit over there and he would be very  
21 close to me. But I'm a very nervous person, very  
22 frigid, so I kind of feel like if I -- I kind of  
23 feel like what happened to some of the other  
24 women -- the woman who was the staffer -- maybe  
25 she just comes across as maybe a little bit more

1 L. Boylan

2 friendly and was deeply afraid, too, but I don't  
3 really hide my frigidness well. So he was  
4 always -- he was -- I can't really describe it.  
5 He's very scary.

6 MS. CLARK: Okay.

7 I think I see Marco is appearing.

8 We're probably near the end of the --

9 THE VIDEOGRAPHER: Media unit, yeah.

10 Can I change it out? I'm sorry. Can  
11 we switch it out?

12 MS. CLARK: Yeah. Why don't you go  
13 off the record?

14 THE VIDEOGRAPHER: Okay. Standby,  
15 please. Thank you.

16 This is the end of media unit number  
17 one.

18 We are now off the record at  
19 12:47 p.m.

20 (Recess taken)

21 THE VIDEOGRAPHER: This is the  
22 beginning of media unit number two.

23 We are now on the record at 1:19 p.m.

24 Back from break.

25 Q. Prior to the break, you said that you

1 L. Boylan

2 believed that there was some sort of [REDACTED]  
3 [REDACTED] between the Governor and  
4 Senior Staffer #1 .

5 What is that feeling or opinion based  
6 on?

7 A. One, unfortunately, as I've learned,  
8 if you're an attractive woman and you're in his  
9 circle, he doesn't know how to be appropriate to  
10 you if he finds you attractive. Two, she would  
11 come down from the second floor constantly at  
12 events. I overheard that she and, like, Senior Staffer #4  
13 Senior Staffer #3 and maybe Senior Staffer #2 had had sleepovers at  
14 the mansion before. I heard that when they went  
15 to Israel, they had adjoining rooms. There's all  
16 these situations because I was -- even before I  
17 worked for them, I was on the events team, so  
18 you're prepping for events. The reason why I  
19 would do that is because I knew the specifics  
20 about a job announcement and how appropriate would  
21 it be to do X, Y and Z.

22 So, you know, you hear these things  
23 and pretty consistently in ways that were  
24 inappropriate sounding to me. I felt it by the  
25 way that she interacted with me and with other

1 L. Boylan

2 people. I felt like I was in some -- ultimately  
3 when I kept trying to say I didn't want the job or  
4 when I had it, like, I was in some kind of weird  
5 triangle, that I didn't know the full, like -- you  
6 know when you see an iceberg and then there's an  
7 iceberg under the water and you don't know how far  
8 it goes, that's how I felt. And I believe most  
9 people in the inner circle believe that as well  
10 about the two of them.

11 Q. Who told you about them having  
12 adjoining rooms in Israel?

13 A. [REDACTED]

14 Q. I'm sorry. Who?

15 A. [REDACTED]

16 Q. Who was he?

17 A. [REDACTED]

18 He also told me that when I left and was running  
19 for Congress originally, that [REDACTED] Senior Staffer #1 called or  
20 had someone call Nadler's staff and talk shit  
21 about me that she thought that they could, you  
22 know, share with the public. I don't know what  
23 the context of that was, but I knew that, you  
24 know, I had a problem in [REDACTED] Senior Staffer #1

25 Q. Who told you that [REDACTED] Senior Staffer #1 and some of

1 L. Boylan

2 the other women you mentioned at sleepovers at the  
3 mansion?

4 A. I believe actually Senior Staffer #2 Senior Staffer #4  
5 and Senior Staffer #3 kind of joked about it one time, like  
6 kind of movie night at the mansion. But I never  
7 forgot it.

8 Then I received an anonymous call --  
9 and this is unrelated, but kind of related -- that  
10 I still don't know who it was, but a woman who I  
11 assume works in some kind of staffing situation at  
12 the mansion that Senior Staffer #1 slept at the mansion all  
13 last year during the pandemic pretty much until  
14 the negative story about the Governor and [REDACTED]  
15 [REDACTED]  
16 and that wiggled them out.

17 I don't know the veracity of that, I  
18 didn't know who was person was, but it fit with my  
19 sensibility of this person, the Governor  
20 primarily.

21 Q. When did you get that anonymous phone  
22 call?

23 A. I think it was -- it was very scary.  
24 I posted on Twitter that it was an unknown number,  
25 so I could look back. I think it was -- it was

1 L. Boylan

2 after my media piece. All of that time has  
3 condensed kind of mentally because of all the  
4 craziness that it created in my life and before.  
5 I almost didn't answer because that's how I used  
6 to receive phone calls or Andrew Ball. It would  
7 be unlisted. And it's very triggering, but I  
8 answered it because I kept getting this number and  
9 it was a woman and she said, like, did you know  
10 and she said that they're [REDACTED] and  
11 that he had this [REDACTED]  
12 [REDACTED] which also didn't surprise me.

13 Again, I don't know the veracity of  
14 these answers or the speculation and it doesn't  
15 really -- I just wants to like present a picture  
16 of if every senior person for the most part kind  
17 of sees some dynamic of this happening and then  
18 you're managed by both of these people and then  
19 all of the other women are really nasty to you and  
20 just report to this women or the Governor, it's a  
21 deeply unsettling -- it's like -- I'm originally  
22 from California. You go under a wave and you  
23 don't know which way is up. That kind of  
24 environment is deeply unsettling. I don't really  
25 care that dynamic, whatever it is, it's just

1 L. Boylan

2 deeply unsettling because there are no boundaries.

3 Q. Did you ever hear the Governor refer  
4 to anyone else using nicknames?

5 A. Yeah, he had weird nicknames for  
6 everyone.

7 Q. What are some of the nicknames you  
8 recall?

9 A. I don't know. I mean, he wasn't very  
10 nice, so they weren't, like, nice nicknames. He  
11 would kind of -- he would chip away at something  
12 physical. It was always something physical. When  
13 Stephanie Benton had a bad haircut or he was  
14 really evil to [REDACTED],  
15 [REDACTED]  
16 [REDACTED]. They  
17 weren't -- I mean, he's very like my grandpa was,  
18 a man from another time. My grandfather was,  
19 like, an Irish immigrant and he would describe  
20 people as their ethnic background and treat them  
21 that way and I was the Irish girl.

22 I have an impression that he kind of  
23 likes Irish girl and he was very pejorative behind  
24 the scenes about people's ethnic backgrounds. He  
25 asked me on a few occasions about my husband being

1 L. Boylan

2 Asian in a weird man from the 1950s way.

3 Q. Any comments about any staff members'  
4 ethnicity or ethnic background that you recall?

5 A. No. One time when [REDACTED] was  
6 on the plane, he slapped him on the ass when he  
7 was getting his coat arranged and I just thought  
8 that was weird. [REDACTED] kind of laughed it off,  
9 but I thought it was weird.

10 He would make weird comments about  
11 Puerto Ricans, like, looking a certain way and I  
12 think [REDACTED] thought that was kind of rude because I  
13 think [REDACTED] is half Puerto Rican and he would say  
14 Puerto Ricans look every kind of way. You know,  
15 he's an ignorant person. I would say that's  
16 clear. Him talking to the rest of the staff about  
17 how SS #1 [REDACTED] had gotten too skinny was weird. You  
18 know? [REDACTED]

19 [REDACTED]? You know what I mean? Very odd.  
20 He would compare -- he frequently compared women.

21 Q. What sort of comparisons?

22 A. Like if they were dressed nicely and  
23 appropriately, which meant high heels, they're  
24 skinny, ideally tall and they're well groomed and  
25 they're all white.



1 L. Boylan

2 I mean, the other kind of missing  
3 story here is my impression is that he likes white  
4 women, so he was surrounded by white women, which  
5 is also problematic, too. Right?

6 Q. Were there any non-white women in the  
7 sort of key Chambers positions?

8 A. Regional reps. [REDACTED]  
9 There were a few more -- the most senior people,  
10 most senior people except for Alfonso David and  
11 Rob Mujica were all white.

12 Q. Did he ever refer to you using any  
13 nicknames?

14 A. It wasn't intentional, but early on  
15 that Lisa Shields email from communicated to me  
16 from him to Stephanie Benton, he would either  
17 intentionally or accidentally -- I'm not really  
18 sure which is it is -- call me Lisa a fair amount  
19 of the time.

20 Q. You referenced a Lisa Shields email.  
21 Why don't you look to tab six in the  
22 binder?

23 A. Yes.

24 Q. Is this a text exchange between you  
25 and Stephanie Benton?

1 L. Boylan

2 A. This is an email. He doesn't do  
3 email, so an email from Stephanie communicating  
4 that he had said something, it's clear that that's  
5 from him.

6 Q. This was December 2016.

7 "You wrote Stephanie, it was a great  
8 trip. Particularly interesting at the GM plant  
9 this a.m."

10 What trip was that?

11 A. That was a night to do an  
12 announcement for a jobs announcement in the  
13 Buffalo area and Howard, I believe, went and I  
14 staffed it. My job on the plane would have been  
15 to communicate with them, give them information,  
16 give them details, context that they could both  
17 add to their speeches and I believe that was the  
18 first time I flew with the Governor. This, to  
19 me -- like the tour of his office was, like, a  
20 watershed for me because I was trying to be  
21 professional and trying to make -- you asked me if  
22 I tried to make friends with Stephanie. Of course  
23 I wanted to. You know, you'd be a success if  
24 you're well liked by your co-workers.

25 So I was trying and my professional

1 L. Boylan

2 overtures were met with stuff like this and  
3 sometimes they were, you know, quizzing me about  
4 information and sometimes it would be this and I  
5 would have no idea which it would be and I thought  
6 it was really brazen that that was in an email and  
7 I think more than anything what was unsettled to  
8 me was that this was a communicated to him by a  
9 woman on his staff.

10 So that became something I've never  
11 seen anywhere else. I've been sexually  
12 harassed -- I'm not a spring chicken anymore.  
13 I've been sexually harassed throughout my career,  
14 but not in a way where the whole environment was  
15 set up to feed the predator and this and every  
16 interaction I had with the Governor and the  
17 culture felt like it was all to feed the predator.

18 Q. You took a screenshot of this email?

19 A. Yes.

20 Q. Did you take a screenshot the day you  
21 got it?

22 A. I believe so. Yes.

23 Q. What did you do --

24 A. One hundred percent I can't say, but  
25 I believe so because I remember being like holy

1 L. Boylan

2 shit, this is something.

3 Q. Did you take a screenshot if not that  
4 day around that time period?

5 A. Yes.

6 Q. Did you share the screenshot with  
7 anyone else prior to recently?

8 A. My mom, my husband, some of my  
9 girlfriends. Yeah. But it was also -- you know,  
10 I mean then it was like a one off, right, because  
11 I didn't really interact with him it was like look  
12 at this weird thing. But then in ways that I  
13 could not anticipate, it became my life and it was  
14 deeply humiliating on some level. I think a lot  
15 of people are, like, of course this happens to  
16 young women who have no power. Well, I was really  
17 senior and I had worked my whole life to get to a  
18 point where I would be taken seriously and I  
19 wasn't being taken seriously and I worked so hard  
20 to be some little doll for the Governor of New  
21 York and that was deeply humiliating. So I would  
22 just try to be as professional, focused, go with  
23 the flow, keep everyone happy as possible.

24 Q. When you got this email from  
25 Stephanie, did you know who Lisa Shields was?

1 L. Boylan

2 A. I had no idea who that was. I  
3 thought maybe that was like Brooke Shields' sister  
4 or something. I didn't know who the hell that  
5 was.

6 Q. Did you do anything to find out who  
7 she was?

8 A. Yeah, because this is the Governor.  
9 When you're sent a message, you're like I need to  
10 know what this is. So I looked it up and I'm like  
11 why -- what is this woman who works at the Council  
12 for Relations, what is she to do and then I think  
13 I, like, Googled his name and her name and it  
14 appeared that they had dated and then that was  
15 later confirmed in a meeting where he was doing  
16 something, you know, sometime later. The message  
17 was clear. I received the message. This to me  
18 was very much a romantic nonprofessional overture,  
19 no question.

20 Q. How often did the Governor call you  
21 Lisa?

22 A. He would mistake my name because  
23 Lindsey, Lisa, so I don't know that it was  
24 necessarily always intentional. I think it was  
25 literally like he would slip and that was also

1 L. Boylan

2 embarrassing. So again, I would pretend like  
3 nothing was happening.

4 But when he was doing something --  
5 later on we were doing something where he was

6 [REDACTED]  
7 [REDACTED] on something and it somehow came up, he  
8 said, you know, [REDACTED],  
9 Lisa Shields, so I had confirmation that this had  
10 happened.

11 Q. Did the Governor ever refer to you  
12 or -- using terms of endearment like honey or  
13 sweetie or anything like that?

14 A. Yeah. Not sweetie. I think he  
15 would -- this makes me feel sick. Yeah, he would  
16 use terms of endearment, but he wasn't very nice.  
17 I'm trying to think. No, not really. It wasn't,  
18 like, something that could be confused for old  
19 school niceness. The interactions that were  
20 inappropriate were overtly power related and  
21 overtly sexual. They were not romantic as they  
22 were sexual.

23 Q. Did you hear him refer to other women  
24 on staff as honey or sweetie or darling or  
25 anything like that?

1 L. Boylan

2 A. I think I referred to -- I think he  
3 would do that with like -- not sweetie. I feel  
4 like I heard maybe honey or something to like  
5 maybe younger women like Caitlin who sat in front.  
6 Caitlin who I know you talked to because I've  
7 spoken with her before all this escalated -- not  
8 about anything she talked about with you, but I  
9 just know that she's probably on your list -- she  
10 sat in the same seat as Staffer #5 or whatever,  
11 like manning the phones basically.

12 Q. If you could turn to tab seven --

13 A. Yes.

14 Q. -- this is an email exchange between  
15 Howard Zemsky and Jill DesRosiers.

16 How did you see this?

17 A. Because my job as his Chief of Staff  
18 was to man his emails.

19 Q. And did you take a screenshot of  
20 this?

21 A. I did. I took a screenshot of this  
22 because this was more of the -- the alarming  
23 thing -- the thing that really alarmed me, again,  
24 that so much energy was being put into him wanting  
25 to know where I was, which was scary, but also

1 L. Boylan

2 that the formal channels of the organization were  
3 being deployed in this way was very scary to me.  
4 I didn't -- you know, I just kept moving. I'm,  
5 like, a person who rises to the occasion, but I  
6 had the presence of mind to take a picture because  
7 I said I just need to save this.

8 Q. When Ms. DesRosiers said "Is your  
9 Chief of Staff going tomorrow? Just got that  
10 question" --

11 A. That's exactly -- there's no question  
12 that is literally the Governor asking her if I'm  
13 going to be there. There's no question.

14 Q. What makes you so certain it's the  
15 Governor and not someone who is planning the event  
16 or something like that?

17 A. Bill is the most senior person. Jill  
18 is everyone's boss on events. There would be no  
19 other person who would be -- who would force the  
20 most senior planner to ask that question. Do you  
21 know what I'm saying? I guess maybe Melissa  
22 because Melissa, she reported to Melissa, too, but  
23 Melissa would never ask if I was going. It  
24 would -- there's no question in my mind. It's not  
25 a 99.90, it's a 100%.



1 L. Boylan

2 Q. Do you know what the event was in  
3 Rochester that's being referenced in this  
4 exchange?

5 A. I don't. I don't.

6 Q. Did you tell anyone about this  
7 exchange?

8 A. My mom. I told my mom everything. I  
9 mean, I didn't tell as many people because my  
10 friends were really proud of me in a lot of ways.  
11 This is a really senior position to have and it  
12 was humiliating and it made me feel like my  
13 accomplishments were undermined by having this  
14 kind of attention. I didn't tell as many people  
15 as, you know, I might have otherwise.

16 Q. If you could turn to tab eight, this  
17 is an exchange on November 4th --

18 A. My mom knows everything. I can tell  
19 her everything. She's seen it all. She didn't  
20 get to grow up in a time where women are ever  
21 believed, so I tell my mom everything.

22 Q. This was an exchange of texts with  
23 your mom?

24 A. Yes.

25 Q. And is this an accurate, unedited

1 L. Boylan

2 version of the exchange you had with your mom that  
3 day?

4 A. Yes. I think it went on longer, but  
5 this is the exchange.

6 Q. You said it went on longer.  
7 Did it go on longer about this  
8 subject or did it switch topics?

9 A. No. We switched -- I mean, we would  
10 go back and forth. I don't like talking on the  
11 phone -- I hate the phone -- so my mom and I  
12 communicate via text frequently.

13 Q. Do you have texts with your mom about  
14 other issues related to our investigation?

15 A. I don't think so. She like  
16 literally -- she had these. My mom saves  
17 everything. She found, like, an old laptop, so  
18 she found this. I -- you know, I'm in government  
19 and politics. Like the last thing I would want to  
20 do -- you know, I was very much never going to  
21 talk about any of this stuff until I was 80 and he  
22 was dead maybe. But then Charlotte reached out to  
23 me. So I was never in the business of, like, let  
24 me live journal my experience, you know?

25 Q. If you would, after today -- I don't

1 L. Boylan

2 want to burden your mother too much, but just ask  
3 her to look and see if she has any other texts  
4 between the two of you about these incidents --

5 A. All of it? She has a few, I think,  
6 where I would send her a message being like I'm  
7 having a really bad day, something like that. And  
8 she knew the context, so I didn't have to say  
9 anymore. I think she has a few like that, but  
10 they didn't get us anywhere new, so to speak.

11 Q. I'll follow up with Jill later about  
12 that.

13 A. Sure.

14 Q. I want to talk to you -- were there  
15 other occasions where you found out that the  
16 Governor was asking if you were going to be at an  
17 event?

18 A. Yeah. I would be asked -- I would  
19 get a call, I would get a text, I would get an  
20 email from someone -- Jill, Stephanie, Annabel --  
21 asking if I would be going to something. Howard  
22 at some point said that the Governor has a crush  
23 on you.

24 Q. Do you recall when in your tenure  
25 there Howard said that to you?

1 L. Boylan

2 A. Early. I think it was around the  
3 time that he got the email asking if I was going  
4 to be at this event.

5 Q. What did you say to Howard when he  
6 said "I think the Governor has a crush on you"?

7 A. I brushed it off because what do I  
8 do? This is my boss kind of confused. If he's  
9 confused and he's maybe one of the most powerful  
10 people in the state, what am I going to do? I'm  
11 not going to create a problem. There is no  
12 problem. That was --

13 Q. Did anyone else ever tell you that  
14 they thought the Governor had a crush on you?

15 A. People said it all the time. It was  
16 clear the way he interacted with me was very  
17 brazen, even in public. He would hold my hand a  
18 little too long. He would -- you know, it was  
19 weird and I would always down play it because, you  
20 know, for most of history and all of the women of  
21 my family, they never got to be taken seriously.  
22 I was the first one who got to do everything and  
23 why would I let this creep monster bring me down?  
24 You know what I mean? I don't want to feed into  
25 that. I would pretend like I was totally sanguine

1 L. Boylan

2 and happy and I would try to make as many positive  
3 friendships with the staff so that everyone knew  
4 how capable I was, how hard working I was, so it  
5 would diminish whatever else was happening.

6 Q. Other than Mr. Zemsky, do you recall  
7 anyone else who said that they thought the  
8 Governor might have a crush on you?

9 A. I think [REDACTED] at some point  
10 said "Wow, that was a really long exchange" at a  
11 tourism craft beverage event because the Governor  
12 came off stage and he was shaking people hands and  
13 I went to say thank you and he stood there in  
14 front of all of these people for far too long  
15 holding my hands.

16 Q. Who is [REDACTED]

17 A. He's the head of marketing at ESD.

18 Q. Did you attend a holiday party for  
19 senior staffers in 2016?

20 A. Yes, I did because that was just  
21 after the Trump presidential election and I think  
22 we sent you a picture from that holiday party or  
23 one of the holiday parties around that time  
24 because it was on the evening of the first State  
25 of the Union address. I vividly remember that. I

1 L. Boylan

2 don't know dates. I know kind of presenting  
3 events that I can kind of tie them to.

4 Q. Where was that party?

5 A. The pool house in the Governor's  
6 mansion and I had not been there before, I don't  
7 believe.

8 Q. Did you ever go to any holiday  
9 parties in the Capitol Building?

10 A. Yes, that was the one where I got  
11 called up for the special tour.

12 Q. What year was that holiday party?

13 A. I believe it was the same year. I'm  
14 not -- no, maybe it was the next year. I figured  
15 out what it was based off of the dates and the  
16 location, but it was earlier on in my tenure and  
17 there's an annual holiday party with all the  
18 agency heads and senior folks from across the  
19 state and it's in this giant room where he does  
20 the State of the State, so hundreds of people.

21 He makes his way off the stage,  
22 shaking hands, I'm in the back and he sees me and  
23 I'm with one of the senior people at ESD who  
24 doesn't really like me that much and I felt like  
25 he kind of diminished me, so I especially didn't

1 L. Boylan

2 want to have a weird interaction with the Governor  
3 in front of him, [REDACTED].

4 So I went away, thinking that the  
5 Governor might be weird with me again and I don't  
6 want to have those kinds of interactions period  
7 and I don't want to have them in front of someone  
8 who already is, like, a dynamic with me that he  
9 doesn't like me, he doesn't like me being in his  
10 space, he doesn't like sharing the leadership team  
11 with me.

12 Anyways, I walk up the sunken part of  
13 the auditorium, I walk up the stairs to the back  
14 area and I see him walk up a few minutes later up  
15 the stairs, looking at me and I kind of look away,  
16 like I pretend like I'm looking at something else  
17 and then he leaves and then not a minute later, I  
18 receive an unlisted call and it's Andrew Ball  
19 saying that I need to come up with the Capitol  
20 Building for my special tour of the second floor.

21 Q. Where the party was taking place,  
22 where was that?

23 A. I always confuse it with the egg, but  
24 it's the place -- it has a special name, like the  
25 Empire Center Room or something in the -- like

1 L. Boylan

2 there's the Capitol Building and then there's the  
3 underground that goes to the different spaces.  
4 It's in the large convention center, the specific  
5 name. It's where he does the State of the State  
6 and you can literally leave that room, go  
7 underneath and you can come up into the Capitol  
8 Building and that's what I did.

9 Q. So you got a call and you said it  
10 came up as an unknown number or unlisted or  
11 something like that?

12 A. I would have to answer the phone  
13 because it's someone.

14 Q. So when you answered the phone, who  
15 was it?

16 A. It was Andrew Ball and he said "The  
17 Governor wants you to come up and get your tour of  
18 the second floor."

19 Q. What did you say?

20 A. I'm sure I said something like "Right  
21 now? Is that -- right now? A tour?" Then I said  
22 okay because that's what you do. You say okay.

23 I start walking over there  
24 underground and I'm pretty afraid because the  
25 interaction that I just had, the sequence of



1 L. Boylan

2 events is a very clear predatory situation and I'm  
3 very afraid. I think I'm over my head. Every  
4 other time, I feel like I can use all of my skills  
5 to find a way out of the interaction but this  
6 really scared me because I felt like I was in over  
7 my head.

8 So I called my husband, and I grabbed  
9 the elevator to the second floor -- there's this  
10 black iron wrought elevator on the second floor of  
11 the Governor's side -- and I just tell him I'm  
12 afraid and I think he's a little bit bewildered  
13 because I'm not a phone person, I hate the phone  
14 and I never say I'm afraid. So he just says it's  
15 okay, you're okay and I don't remember anything --  
16 I don't remember how I finished that call and I  
17 get off the elevator and Andrew is looking at me,  
18 kind of smiling in a weird way.

19 Now we're in the Hall of Governors  
20 and I've actually been there before because it's  
21 an open space, so it's even more embarrassing that  
22 I'm getting a tour because I'm not a five-year-old  
23 or in the fifth grade in a civics class.

24 All the underling offices are open.  
25 You know, a few people are at work, even though

1 L. Boylan

2 most people are at the party still and so it's  
3 just underlings here, you know, curious, looking  
4 out at, like, palace intrigue and seeing me get a  
5 tour, which is on one hand very humiliating  
6 because it feels like, you know, in that movie  
7 with the Fox guy, not Rupert Murdoch, whoever it  
8 was, the creepy one who would have women twirl. I  
9 constantly feel like I was being asked to twirl.

10 So anyway, I get up there, I asked  
11 him -- I said oh, are there any cameras here, you  
12 know, like just kind of, like, playing it off  
13 because I want to know if there are cameras, like  
14 I want to know if I'm going to be captured and I  
15 want to know if he -- if I'm going to see him,  
16 that his actions will be influenced by being on  
17 screen. Right? You know, I'm just trying to  
18 figure this out because I'm a little afraid.

19 We walk down the hallway and then we  
20 walk back and I get dropped off in his office, the  
21 front area where all the secretaries are, and I'm  
22 kind of, like, confused about where I am and then  
23 I am pushed into the second room, which I would  
24 later learn is like, you know, his big table staff  
25 area and then I'm left alone and the doors close

1 L. Boylan

2 behind me and I --

3 Q. Let me stop you right there for a  
4 second.

5 You asked Andrew are there cameras?

6 A. (No audible response)

7 Q. Andrew left you in this staff room  
8 and then he left?

9 A. Yes.

10 Q. Okay. Continue. Sorry.

11 A. I'm alone, the door is closed and I  
12 know him afraid because I feel it and I don't  
13 sweat, I don't ever have BO or anything like that,  
14 but I literally do in this moment because I'm  
15 afraid, I'm, like, very afraid and I don't like to  
16 be touched and I just have this, like, recurring  
17 feeling that he's going to come in and what if he  
18 touches me, like what if he, like, kisses me or  
19 touches me or something. What do I do without  
20 offending him. Like what do I -- what do I do?  
21 Then he comes in -- you know, I had never been in  
22 this room, so I didn't know where he was going to  
23 come from or what was happening.

24 He comes in from what is his inner  
25 courtyard room, which has another door to the red

1 L. Boylan

2 room where he does his press conferences, I would  
3 later learn. But he comes in, he comes over and I  
4 do my kind of like trying to be like super nerdy  
5 and ask like real questions about history, to try  
6 and just stay on that and he shows me this -- I  
7 think it's a cigar box, but some people describe  
8 it as a humidor. I don't know what the  
9 distinction between those are. It had cigars  
10 inside it. And he said "These cigar boxes I got  
11 from Bill Clinton" and he kind of smirks and  
12 smiles at me. It was really creepy because the  
13 illusion is very clear to me, cigars, Bill  
14 Clinton, Monica Lewinsky.

15 He just kind of stands there and it's  
16 really awkward and I just kind of start looking  
17 at -- oh, look at this picture, you know, kind of  
18 do a thing like that. And I don't know how long I  
19 was in there because I just kept thinking how far  
20 is he away from me, like is he getting closer to  
21 me, is he going to do something, what's going to  
22 happen and what would I do if he did something, I  
23 don't know because I can't offend him and then he  
24 let me out of the room.

25 Q. Did he touch you at all during the

1 L. Boylan

2 tour?

3 A. Not on this occasion.

4 Q. When you --

5 A. That was the most afraid I ever was  
6 because, again, it was another level of state  
7 resources being directed to reel me in. You know,  
8 I really -- a tour and the unlisted number and he  
9 leaves a party and it's so brazen and I realize  
10 that like anything could happen and what would I  
11 do --

12 MR. KIM: I think you broke up a  
13 little bit.

14 You said that's the most afraid I  
15 ever was?

16 THE WITNESS: Yes.

17 MR. KIM: Okay.

18 Maybe it was just me, but I didn't  
19 capture the word "afraid."

20 A. Even later -- I'm sure I'll get to  
21 it -- when I'm walking out, he oddly kisses me,  
22 which was a weird exchange. I can't tell why.

23 It's like the walls fell in with this  
24 tour because all of the resources were being  
25 directed at me and I kind of kept thinking, you

1 L. Boylan

2 know, there was always a way to protect myself or  
3 distance myself and I realized here I really have  
4 no way to protect myself and that was the most  
5 scared I ever was.

6 Q. So you said he let you out of the  
7 room.

8 Did he -- did you or he say anything  
9 at the end of this tour?

10 A. I don't remember. As I said, I was  
11 sweating and I don't sweat and I was very afraid.  
12 I was just trying to pretend like I was totally  
13 fine and nothing had happened because, of course,  
14 all of these secretaries are watching me as I come  
15 out. I have no idea how he closed out. I  
16 remember the cigar exchange and that's all I  
17 remember.

18 Q. Were any of his executive assistants  
19 sitting in the outer office?

20 A. I believe Stephanie Benton was, but  
21 I'm not 100% sure. I was so afraid. Between  
22 being afraid of what would happen and fixating on  
23 that and wanting to look like everything was fine,  
24 I can't tell you more than what I just told you,  
25 honestly.

1 L. Boylan

2 Q. When you left, what did you do then?  
3 You walked out of his office? What happened next?

4 A. I left immediately and I think I  
5 called my husband probably. Then I just kind  
6 of -- and I had missed by this point some  
7 interaction time between my co-workers and I think  
8 I just tried to, like, play it off. Like, oh, I  
9 have to, you know, check on something. You know?  
10 I didn't -- there's so few women who get really  
11 high up in a lot of these positions that whether  
12 it's me and it's humiliating, the thing about, you  
13 know, like, [REDACTED]  
14 [REDACTED],  
15 none of it's very -- it's not a -- I don't want to  
16 feed into that. Right?

17 So I would just try to play it off as  
18 much as I can, unless I was with someone that I  
19 could really trust like my mom or my husband. And  
20 at a certain point, I didn't want to worry my  
21 husband too much either. He didn't really -- that  
22 really freaked him out and the Second Avenue  
23 subway thing did because he was shocked at how the  
24 Governor stopped in front of a sea of cameras and  
25 came over to me and my husband.

1 L. Boylan

2 At that point after we had that  
3 interaction, he was very freaked out by it and he  
4 said "You're not kidding. He's really fixated on  
5 you in a weird way" and he felt like the Governor,  
6 like, kind of handled him in a power play.

7 Q. Getting back to the party, when you  
8 came out of the office, was Andrew Ball waiting  
9 for you? Was he around anywhere?

10 A. I don't remember. I don't.

11 Q. Did you go back to the party at that  
12 point?

13 A. I don't think I did. I think because  
14 by that point, but the time I -- all that took  
15 maybe 20, 25 minutes, all of it together maybe 30  
16 minutes. I don't think I went back. I think that  
17 was, like, the whole many agencies, but like  
18 Governor's holiday party, but I think ESD was  
19 having some kind of thing, too, and I was trying  
20 not to miss stuff.

21 Q. Did you go to the ESD party or did  
22 you go home? Do you remember what you did after  
23 you left his office?

24 A. I know I got out of there. I  
25 think -- I don't remember. I mean, my time in



1 L. Boylan

2 Albany was pretty tough because I didn't live  
3 there and I wasn't going to move there and at this  
4 point, I had, like, [REDACTED]  
5 [REDACTED] and, you know, my time there was  
6 negotiating getting there and getting home. So I  
7 never really lived in Albany the way that all of  
8 the other women I think who have come forward  
9 have. That probably helped me, honestly.

10 Q. Other than the conversations with  
11 your husband, did you tell anyone else about that  
12 incident around the time it happened?

13 A. Yeah, I think I probably told -- I  
14 think I probably told -- I told my friend [REDACTED]  
15 for sure. She remembered the plane incident which  
16 she sent to you and she had some finite dates  
17 around that. I told I think [REDACTED], who I  
18 shared some stuff with you. But at the time, I  
19 know I shared it with my mom, I shared it with my  
20 husband. I'm not sure that I did more.

21 I mean, as I said, it's a little bit  
22 humiliating for me. You know? I wanted to -- all  
23 my friends were so proud of me, like this woman  
24 from some other place had become the most senior  
25 job secretary and all that and -- well, I guess at

1 L. Boylan

2 this point I would have been Chief of Staff, but  
3 it was a really big deal, you know, and I'm not  
4 typically someone who asks for help or conveys  
5 that, you know, that wouldn't be something I  
6 wanted -- it was embarrassing. It was sad. I  
7 know I talked [REDACTED] at  
8 that, but I think --

9 Q. [REDACTED]

10 [REDACTED]

11 You referenced before -- and we've  
12 spoken about it before -- getting a rose on  
13 Valentine's Day.

14 Did someone hand it to you or did you  
15 find it someplace?

16 A. I believe [REDACTED], that guy, he brought  
17 it down to me.

18 Q. Did he say anything when he gave it  
19 to you?

20 A. He said "This is from the Governor."

21 Q. Was there any note or card with the  
22 rose?

23 A. No. But I was told that he had given  
24 it to, you know, some of his female staffers, but  
25 it's different to give it to some of your -- it's

1 L. Boylan

2 creepy as hell regardless and it's not serious,  
3 but it's a gateway thing to me of lack of  
4 boundaries. But imagine, like, it's less weird if  
5 a bunch of women on the same floor get it and it's  
6 very weird if one woman on a floor where no one  
7 even knows the Governor gets it and he announces  
8 it's from the Governor and he does it in front of  
9 other people.

10 Q. No one on your floor got a rose from  
11 the Governor to your knowledge?

12 A. No one did. No one did. This was  
13 for his staff and I was Chief of Staff of an  
14 agency.

15 Q. Do you know who --

16 A. I don't know.

17 Q. Do you recall what year that  
18 happened?

19 A. I think we deduced when that was. I  
20 don't know offhand. It was on the earlier side.

21 Q. Did it happen any other -- did it  
22 happen just one Valentine's Day or more than one  
23 Valentine's Day?

24 A. Just one Valentine's Day. Things  
25 changed. Like he continued to get -- like I felt

1 L. Boylan

2 the walls were constantly closing in more. Like  
3 he had even fewer boundaries. It started with the  
4 rose thing and then it would become I was then on  
5 the plane and he could ask me weird questions and  
6 look at me in a weird way or he could invite me to  
7 all of the campaign events and I would have a seat  
8 that was clearly picked out in advance, like he  
9 knew where it was and, you know, all those kinds  
10 of things kind of escalated.

11 Q. Other than the assistant that sat  
12 near you, did you tell anyone else about the rose  
13 when it happened?

14 A. Three women observed him bringing the  
15 rose or kind of around it. It was [REDACTED],  
16 [REDACTED], who still works there and so does  
17 [REDACTED], and [REDACTED]. Two [REDACTED]  
18 worked for me and [REDACTED], you know, semi-staffed  
19 me because I had a constant churn of some of my  
20 EAs was one was elevated to Sir Howard instead and  
21 then, you know, it was challenging.

22 Q. And did you tell anyone who wasn't  
23 present when it happened about it?

24 A. I told my husband. I think I told  
25 some of my girlfriends, but, you know, my

1 L. Boylan

2 girlfriends remember some of the most vivid  
3 things. Like I only told my closest of friends  
4 that I felt like, you know, that I wasn't  
5 humiliated to share with them. Like one of my  
6 best friends is the wife of [REDACTED], the  
7 [REDACTED], so I'm not going  
8 to tell her that stuff -- right? -- even though  
9 she's a dear friend.

10 So I told my friend [REDACTED], who is [REDACTED]  
11 [REDACTED] like me. You know, I told her a fair number  
12 of stuff and she submitted some recollection. I  
13 told [REDACTED], who doesn't live in New York, she  
14 lives in DC. I told her about the plane stuff and  
15 the weird stuff. I told [REDACTED], [REDACTED]  
16 [REDACTED] a lot of  
17 this stuff and she said the story never changed  
18 which she received and [REDACTED] and then my mom. My  
19 mom I told everything.

20 Q. Any other occasions where you got any  
21 gifts from the Governor?

22 A. The picture signed. I would -- I  
23 always got special pictures. He would always take  
24 a picture -- he would always try to take a picture  
25 with me. My last year, when we went to Puerto

1 L. Boylan

2 Rico and I was very excited because of this award  
3 that I worked very hard on to help recover from  
4 Hurricane Maria. We had an evening where he gave  
5 speeches and I situated myself at a table with  
6 students because this was about college students.  
7 He and Melissa were at a table. I also wanted to  
8 be away from Melissa because I really hated the  
9 dynamic with her, it was very toxic for me, so I  
10 was trying to get -- and he situated himself so he  
11 could see me where I was sitting and then right  
12 after he spoke, he came over. There's a sea of  
13 people who are, you know, potential supporters, he  
14 comes over to my table and takes a picture with  
15 the students and me at my table and he stands next  
16 to me and he, like, you know, touches my back. He  
17 would use picture taking to do that in a not  
18 friendly way, in a sexual way.

19 That's why when I read the woman who  
20 he did that weird stuff with at the wedding, he  
21 may be a little old school, but this isn't old  
22 school, it's sexual and I received that and it  
23 was, you know, you know, I keep thinking what if I  
24 had said -- like what if I had done something.  
25 But I really didn't think I had the power to

1 L. Boylan

2 affect changing my own situation at that point.

3 Q. When he took photos with you, did he  
4 ever touch you anywhere other than your back?

5 A. My back, my lower back and my waist.

6 Q. On your waist? Where on your waist  
7 would he put his hand?

8 A. Like around, in, like, a way that you  
9 know, like, my husband doesn't even do.

10 Q. Would it be right at your waist or  
11 would it be below your -- closer to your breast or  
12 down close to your hip?

13 A. Waist, hip. I'm very tall. People  
14 are surprised by that. So it may also be, like,  
15 literally where I am, but waist.

16 Q. Did he ever touch your butt when he  
17 was supposing with you for a photo?

18 A. No. It was clearly sexual to me,  
19 back and waist. Not butt.

20 Q. What made it clearly sexual to you?

21 A. I mean, I feel like I know when I'm  
22 being touched in a weird way. I just know. I  
23 mean, it was -- I would never do that to anyone,  
24 not even my husband. And I'm a politician. I'm a  
25 hugger. I hug people. You can hug people and be

1 L. Boylan

2 in their face and have -- and not have it be  
3 sexual at all.

4 Q. You mentioned that there was a time  
5 that you found a photo on your desk.

6 When was that?

7 A. I want to say it was -- I took a  
8 photo of it. I think it was in the same series of  
9 months around the rose because it was this time  
10 period where I was kind of trying to figure out  
11 what the hell -- I felt I was unsafe even in my  
12 own little refugee, like oh my god, there's  
13 this -- he's coming down with the rose, oh my god,  
14 my door is closed and there's a signed photo of  
15 his face at an event and he does sign photos all  
16 the time so what he would just say is oh, I give  
17 these photos out all the time. I -- my office  
18 remained closed. No one ever came into my office  
19 unless it's to drop off my mail. I'm the most  
20 senior person of the entire agency. No one would  
21 ever come into my office without literally -- and  
22 I asked [REDACTED], I said "Did you drop this off?"  
23 because it freaked me out and she said "No" and I  
24 said "Were you here all the time?" and she said  
25 "No, I was away," so I believe someone dropped it



1 L. Boylan

2 off.

3 Q. Was the photo just the Governor, was  
4 it the Governor and you or something else?

5 A. It was just the Governor.

6 Q. You said you took a photo of the  
7 photo on your desk.

8 Do you still have that photo that you  
9 took?

10 A. I do and what it does have above it  
11 and/or Ms. Clark, I don't know if this is  
12 appropriate, the date -- a date on there. I'm not  
13 sure if that was the exact date it was dropped off  
14 but it's definitely around that general time and I  
15 could get that to you.

16 Q. That was my next question, if we  
17 could get that --

18 A. It's on the phone I'm talking to you  
19 from, but I could get it to you.

20 Q. Do you still have the actual photo  
21 that you took a photo of, the one he signed?

22 A. Maybe. I really tried to throw the  
23 fireball of my experience away.

24 Q. Did you tell -- other than asking

25 [REDACTED] "Did you put this here? Did you see

1 L. Boylan

2 anyone? Did you tell anyone" --

3 A. Both of the [REDACTED] were aware that  
4 this photo had landed on my desk because I asked  
5 them. They both reported to me. They were, like,  
6 my, you know, [REDACTED] and  
7 so they would be the only other people who came  
8 in, so I asked them and they knew there was a  
9 weird, fearful dynamic. I never expressed the  
10 extent of it because it's not my staffers'  
11 responsibility to worry about me. But I didn't  
12 mind people knowing that I was uncomfortable with  
13 the space, the lack of boundaries.

14 Q. Did you tell anyone else about it at  
15 the time?

16 A. I think I asked [REDACTED] if I  
17 could get a lock on my door. I think I asked [REDACTED]  
18 [REDACTED] because he was kind of the operations  
19 person. I said "Is it possible to get a lock on  
20 my door?"

21 Q. What did he say?

22 A. I don't remember, but I didn't get a  
23 lock on my door. But I bet you there's, you know,  
24 potential correspondence related to that and it  
25 would be --

1 L. Boylan

2 Q. You did or did not get a lock on your  
3 door?

4 A. I didn't get a lock on my door.

5 Q. I'm going to switch subjects a little  
6 bit.

7 Did you ever fly on the Governor's  
8 plane?

9 A. Constant. Yes.

10 Q. How often?

11 A. Many times. I mean, I wish I had a  
12 better number for you. I never expected I would  
13 be in an investigation, but 15 times, 12, 15, 20,  
14 somewhere in that category. I don't want to be  
15 off and have -- and come across as not believable,  
16 so I don't want to pigeonhole a specific number of  
17 times. But it was a lot. So many times that I  
18 can't remember every time.

19 Q. Could you describe the seating  
20 arrangements inside the plane?

21 A. It's, like, a very old plane. I've  
22 been on private planes. My husband does some work  
23 where, you know, I end up, you know, on something  
24 like that. So this is a very old one  
25 comparatively. There's two seats facing towards

1 L. Boylan

2 the front of the plane and the Governor would  
3 always sit in one of those two seats and then  
4 there's two seats facing where he would be sitting  
5 and I would always sit in the left seat primarily  
6 and in the case of the strip poker situation,  
7 Abbey Collins or Abbey Fashour was sitting right  
8 there and then there were two seats behind those  
9 two seats and the State Trooper would sit in one  
10 of them. Occasionally, if it was a really busy  
11 flight, there would be another press person on the  
12 other side.

13 Q. You have -- you wrote about in your  
14 medium piece we talked about before an incident  
15 where the Governor made a comment --

16 A. The strip poker one?

17 Q. Strip poker one.

18 When was that trip?

19 A. So that I didn't know offhand. I had  
20 to zero in on it based on where we were going, the  
21 timeframe and also my friend [REDACTED] who I would  
22 visit annually at Christmas corroborated that. I  
23 didn't know it offhand, but I figured out what it  
24 was. I was in -- the date offhand, I don't know  
25 offhand but I figured out which one it was based

1 L. Boylan

2 on where we were going, the number of stops we  
3 had, who was with me, which was Abbey, and then  
4 roughly -- I kind of figured out by process of  
5 elimination what that was.

6 Q. Where was that trip to or from?

7 A. I believe we went to Rochester and/or  
8 Buffalo. I know we went to Rochester at some  
9 point. A lot of times we were going to small  
10 areas, too, so I just said western New York  
11 because I don't remember exactly where it was  
12 honestly --

13 Q. And the Governor --

14 A. -- behind me was his State Trooper,  
15 who I thought was kind of independent thinker, but  
16 a lot of his success is tied to the Governor, so I  
17 doubt he would speak out.

18 Q. Which trooper was that?

19 A. If you said his name, I would know  
20 it.

21 Q. Vinnie Tafasi (phonetic)?

22 A. Yes.

23 Q. So the Governor was sitting in his  
24 usual seat facing forwards; is that right?

25 A. Facing towards the front of the

1 L. Boylan

2 plane, I'm facing him and Abbey is facing him.

3 Q. Was anyone sitting next to the  
4 Governor?

5 A. I don't -- kind of like in the office  
6 tour, this is what I remember: I know that there  
7 were a series of flights that day, that people got  
8 off the plane at different legs and not got back  
9 on. I think Howard was on for the first part of  
10 the day, then he spoke and he drove to Buffalo or  
11 something like that. I do not believe someone is  
12 in that other seat, but I'm not 100% sure. That's  
13 why when I discussed it, I discussed what I know  
14 is accurate.

15 Q. What led up to the Governor making  
16 the comment?

17 A. I know we had had -- like I told you,  
18 pretty much like clockwork, he would even put his  
19 headphones on when we got on the plane, very  
20 quiet, focused on things. He may grill you about,  
21 you know, where we're going, you know, the  
22 information so he can, you know, be prepared.  
23 Then he was typically in a better mood after he's  
24 done his presentation and it was on -- in that  
25 vein, I think perhaps we had done -- he had done

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two stops, two hits, because it did feel a little bit later in the day so I think he had done two hits and it was like on the third, you know, like going back to either New York or Albany or wherever we're going and we get off the plane, he's sitting down and he's clearly -- you know, he's even seated like he's going to engage instead of on his own level thing. He says "Okay, let's play strip poker" and just to be clear, I mean I know this doesn't stand alone, I don't know how to play poker, I don't -- I don't play cards. The idea that I would fabricate this is a ridiculous notion. I don't even know how to play poker. As an aside, after I released my Medium piece -- and I know this is all circumstantial or whatever you call it as a lawyer as well, but a woman reached out to me and she said "Oh my god, I wasn't sure I was going to reach out to you. [REDACTED]"

[REDACTED]

[REDACTED]

So I know that's just circumstantial,

[REDACTED] --

excuse my language -- and I don't even know how to play poker, so why would I say that? It wouldn't

1 L. Boylan

2 even come to my mind.

3 Anyway, he says that and he does  
4 things to up the ante, get a reaction. I don't  
5 think his -- his staff conveyed that I thought he  
6 was literally asking me to play that. I didn't  
7 think it was literal. I thought it was a sexual  
8 innuendo, which is just as inappropriate.

9 So he says that, he's looking just at  
10 me, he's not looking at anyone else on the plane  
11 and for a second, I'm thinking what do I do? A  
12 younger woman than myself -- [REDACTED] -- a  
13 younger woman than myself who is very pretty is  
14 sitting next to me and she's watching me, so what  
15 am I going to do. Not to just give in, but to  
16 just keep going, right? Like let it not affect  
17 me.

18 I said "Oh yeah, that's exactly what  
19 I was thinking" in a sarcastic way clearly and  
20 that's how I know she was right there, because I  
21 was very conscious that a younger, very attractive  
22 woman was sitting next to me and unless she's not  
23 his type, if there's a young attractive women that  
24 he finds attractive in his circle, he's been  
25 inappropriate with her if he's had the



1 L. Boylan

2 opportunity. So that's how I know she was right  
3 there.

4 Then Vinnie was behind me. It is  
5 possible that Vinnie would not have heard this  
6 because he's right next to the pilot, you know,  
7 behind the seats. But the Governor didn't say it  
8 quietly.

9 Q. Did Abbey say or do anything?

10 A. No one would say or do anything ever.  
11 That's how this worked. I would be in the middle  
12 of a weird dynamic and looking around, you would  
13 feel like that's just normal because you would get  
14 no reaction from anyone else.

15 Q. I'm going to ask you to look at tab  
16 nine.

17 A. Okay.

18 Q. This is flight schedules for the  
19 Governor.

20 Can you pinpoint which flight you  
21 think you were on?

22 A. I don't know offhand. It would have  
23 been -- it was definitely with Abbey and me and I  
24 think John had been there earlier in the day and  
25 Howard was not on the plane at this point.

1 L. Boylan

2 The other thing about these flight  
3 schedules is they're not accurate -- they're not  
4 always accurate for people getting off the plane.  
5 So whatever the response from the Governor's  
6 office was said Howard, John Majori, all these  
7 people said it never occurred. I was not  
8 suggesting that Howard was on the plane. I don't  
9 believe John Majori was on the plane either. All  
10 I know is that Abbey, the Governor and Vinnie were  
11 on the plane.

12 Q. Was Dani Lever on the plane?

13 A. No.

14 Q. So you said you know that they said  
15 they didn't hear anything?

16 A. That came out in the press.

17 Q. Right.

18 Is it your understanding that Abbey  
19 also said she didn't hear anything?

20 A. That's my understanding, based on  
21 whoever released that statement saying all the  
22 people who were on the potential flight said it  
23 didn't happen and my assumption is that Abbey said  
24 that then because she was on the flight --

25 Q. And --

1 L. Boylan

2 A. -- but I don't know that. I think  
3 it's really unfortunate how she's chosen to, you  
4 know, name her ethics, but whatever.

5 Q. So it's your belief that she heard it  
6 and is lying about it or allowing the Governor's  
7 office to lie on her behalf about it?

8 A. That is my belief, yes. You know,  
9 I -- there are other staffers who in realtime --  
10 someone had had an interaction with her where she  
11 was working on a campaign and she said something  
12 like he was like "Oh, are you coming back after  
13 the campaign?" and she said [REDACTED]  
14 [REDACTED] and then now, she says "Oh,  
15 it's always been a great working environment" or  
16 whatever she was, you know, enlisted to  
17 communicate these answers. She works for the  
18 Governor. [REDACTED]

19 [REDACTED] Right? She  
20 works for the Governor.

21 Q. Was Abbey the one who said [REDACTED]  
22 [REDACTED] ?

23 A. Yes.

24 Q. You mentioned that you told your  
25 friend --

1 L. Boylan

2 A. That was -- this is [REDACTED]  
3 who had that experience, who I am very close  
4 friends with, who worked for a very short period  
5 of time in the Chamber and contributed to, I  
6 think, Rebecca Tradester's piece, but yes, he's  
7 had these interactions with her and he's someone  
8 who I've been, like, I can't believe they're  
9 lying, you know, kind of thing and he said well,  
10 she lied about X, so ...

11 Q. Has she told you anything else that  
12 Abbey or anyone else said about their interactions  
13 with the Governor?

14 A. No, it's just that one. He wasn't  
15 there for very long. It's very hard to stay there  
16 for a very long time and not die.

17 Q. And you talked about having told your  
18 friend [REDACTED].

19 You told her around Christmas time  
20 that year?

21 A. About the flight, yeah, shortly  
22 thereafter.

23 MS. CLARK: This isn't in your binder  
24 because we just got it more recently.

25 Ezra, are you able to screen share

1 L. Boylan

2 tab 31?

3 MR. CUKOR: Yes, I can. Whether I  
4 can turn off mute is another question.

5 THE WITNESS: I'm not seeing it.

6 MS. CLARK: It hasn't come up yet.

7 Ezra, are you able to see my screen  
8 now?

9 THE WITNESS: Yes, I'm very -- unlike  
10 me, she's a dates person.

11 MS. CLARK: Ezra, can you close the  
12 tab? You've got the -- you've got the index  
13 up in front of it.

14 MR. CUKOR: The index should be gone.  
15 Is it still there?

16 MS. CLARK: It's still there.

17 MR. CUKOR: I'm going to stop the  
18 share a second.

19 MS. CLARK: You can keep it down for  
20 now --

21 MS. BASINGER: Hey, Anne, Lindsey and  
22 I both of know of this document, we can pull  
23 it up ourselves. Now that we know the  
24 document to which you are referring to, we  
25 can refer to it without Ezra sharing his

1 L. Boylan

2 screen. Nevermind.

3 MR. CUKOR: Is this fine?

4 MS. CLARK: Why don't you take it  
5 down. It doesn't seem to be working. That's  
6 okay, Ezra.

7 MR. CUKOR: Sorry.

8 Q. So [REDACTED] sent an email to you  
9 recounting the lunch you guys had at the Four  
10 Seasons in Georgetown on December 3rd, 2017 and  
11 she said you told her about the plane incident at  
12 the time. The email from [REDACTED] to you is on  
13 February 26th, 2021.

14 Did you ask her to send you an  
15 email --

16 A. Yes. So after all of this came  
17 forward -- I mean, I literally thought, if  
18 anything, I might write about this in a book about  
19 my life at 80 after the Governor was dead and all  
20 these people were dead. So I was not in the mode  
21 of collecting information, but in December, when I  
22 wrote the tweets, I then -- I was smeared and the  
23 retaliation, I hired a lawyer and they said well,

24 [REDACTED]

25 [REDACTED]

1 L. Boylan

2 [REDACTED]. Right?

3 MS. BASINGER: Lindsey -- apologies.

4 THE WITNESS: Sorry.

5 MS. BASINGER: It wasn't me, it  
6 doesn't matter, but it's never what a lawyer  
7 told you. Remember, that's privileged.

8 THE WITNESS: Sorry.

9 A. I assembled -- I tried to assemble  
10 who I shared information with and given the  
11 reasons that I've mentioned to you about my own  
12 frame of mind, I wasn't that sure that I shared  
13 that much with people because it was kind of  
14 humiliating and it continues to be humiliating  
15 because it belittles my abilities and my hard  
16 work. And so I kind of had to say to a few  
17 friends who obviously heard about this "Hey, did I  
18 ever talk to you about this?" I texted with her  
19 and she said yes, you talked about the plane. I  
20 said "Could you send me an email based on what you  
21 recall about that?" and that was the outcome of  
22 that.

23 Q. Did you share that email with any  
24 reporters or anyone else?

25 A. No.

1 L. Boylan

2 Q. What's your relationship to [REDACTED]?

3 A. [REDACTED] is my -- she's one of my best  
4 friends -- she's one of my best friends from

5 [REDACTED] We're  
6 both pretty introverted, so we're pretty private  
7 people, so that's probably why I told her, because  
8 I knew that it would, you know, not be shared.

9 Q. You also gave us very recently an  
10 email from [REDACTED] recounting things  
11 including the strip poker comment dated February  
12 27th, 2021.

13 Was that part of the same thing where  
14 you were talking to people and asking them what  
15 they remember?

16 A. Yes. Yes.

17 Q. And what's your relationship with  
18 [REDACTED]?

19 A. [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED] [REDACTED]  
25 [REDACTED] [REDACTED]



1 L. Boylan

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 I said hey, did we talk about -- I  
7 knew that we had talked about it because, you  
8 know, we just spent so much time together and she  
9 said "You talked all the time. You told me the  
10 same story again and again and again." She said  
11 "I've always hated that guy and I'm so glad it  
12 came out." So that was the product of me asking  
13 her to share whatever I had shared with her.

14 Q. Is there anyone else around this time  
15 right after your Medium piece came out that you  
16 reached out to to say --

17 A. Yeah. Yeah, so I reached out to  
18 [REDACTED], who remembered the awkward, you know, way  
19 he touched me and me commenting to that which I  
20 think we shared with you. I asked -- I didn't  
21 tell my friend [REDACTED]

22 [REDACTED]

23 [REDACTED]. I asked my friend [REDACTED] and she  
24 said I hadn't really got it into it. She said the  
25 total environment was bad, but I hadn't really

1 L. Boylan

2 gotten into it.

3 Of course, you know, she was abroad,  
4 [REDACTED] so it was a  
5 little bit harder to -- you know, I tend to share  
6 these things in person, so she said I hadn't  
7 shared it with her. That's about it.

8 Q. Did you ever travel with the Governor  
9 by car?

10 A. Yes.

11 Q. Did the Governor ever do anything  
12 inappropriate when you were in the car with him?

13 A. No, because he would be sitting in a  
14 different row. So he couldn't physically do  
15 something inappropriate. I did observe him  
16 absolutely -- we were on, like, I want to say 42nd  
17 Street. I think we were coming back from the  
18 plane. Typically, if you landed at LGA, you get  
19 in these caravan planes back to the office -- cars  
20 back to the office. And he was -- he got on the  
21 phone and he was -- and Melissa, I think, was next  
22 to me -- and he was absolutely ripping someone's  
23 head off. Like ripping their head off. It was --  
24 I've only heard him yell that way a few times in  
25 my career and most of them were at [REDACTED].

1 L. Boylan

2 When he got off the phone, I  
3 realized -- I don't remember who it was, but it  
4 was a reporter and I was -- that was a really  
5 pivotal moment for me because if someone could  
6 manhandle reporters that way, where was the fourth  
7 or the fifth state? What's the -- like there's no  
8 way out. There's no way out of this guy. Like  
9 there's no out. And I learned a valuable lesson  
10 then.

11 Q. You said the Governor sat in a  
12 different row.

13 Where did the Attorney General the  
14 Governor sit --

15 A. So he typically had, like, two big  
16 SUV cars that would be -- one would be for him and  
17 there would be an extra one, typically in case  
18 something happened, I think, I assume, is the  
19 protocol. But in this case, there's also like a  
20 lower car, like a car, car. I'm not a car person,  
21 so I don't really know what it is. It's like a  
22 low Ford or something and it goes pretty fast and  
23 he was in the front passenger seat and Melissa and  
24 I were in the back passenger seats.

25 Q. Anything else happen that you recall

1 L. Boylan

2 that -- when you were traveling with the Governor  
3 by car?

4 A. You could hear him chew people out,  
5 but you know, I wouldn't have come forward about  
6 him chewing people out. I came forward because  
7 he's a perpetrator and he escalated the sexual  
8 harassment and assault on some of the women. If  
9 this was just a toxic work environment, we  
10 wouldn't be sitting here.

11 Q. Did you ever travel with the Governor  
12 by helicopter?

13 A. Yes.

14 Q. How many times?

15 A. Maybe three.

16 Q. Did anything inappropriate ever  
17 happen when you were --

18 A. Well, what happened -- I don't know  
19 if we've discussed this one in our last  
20 conversation about Maria Bartiromo, the helicopter  
21 ride that was not, so --

22 Q. Why don't you tell us again?

23 A. The helicopter would be typically  
24 used for small trips from New York City to  
25 somewhere else. And in this case -- and again, I

1 L. Boylan

2 only know this date because I looked up when was  
3 Maria Bartiromo the master of ceremonies for the  
4 REDC ceremony.

5 I was asked to accompany her on the  
6 helicopter flight, just the two of us, up to the  
7 RDC awards and that made sense to me because  
8 remember I told you I oversaw the regional offices  
9 at all points, so this was -- each regional office  
10 would compete to try to get more state resources  
11 for their region based on their plans for that  
12 given year, so this was my show. Right? This was  
13 in some ways my Olympic or Emmy performance, not  
14 for me, but for my team and for my team was the  
15 same thing as for me. So it made sense for me to  
16 go and to assist the woman doing it because I  
17 could answer questions if she had them. Of  
18 course, she got on the plane and she didn't talk  
19 to me and whatever.

20 So we get there nice enough. I told  
21 her I was a big fan because I watched "Money  
22 Honey" and all that kind of stuff and I think  
23 she's cool. And we get there, the ceremony  
24 happens, the whole thing, it's a few hours long,  
25 and I keep receiving these messages from Annabel

1 L. Boylan

2 and Stephanie and maybe even Jill saying "You're  
3 going back on the helicopter with them." I said  
4 "No, I'm not."

5 After the ceremonies, there's the  
6 celebration and that is where I tell my regional  
7 directors and all of the regional leaders like  
8 good job, make sure I talk to each one, tell them  
9 how much I appreciate them. You know, this is my  
10 chance to be a good boss. Right? I keep getting  
11 pinged during this ceremony saying "No, you're  
12 going back with them" and I said "No, I'm not." I  
13 don't say I'm not going back with the Governor. I  
14 say I'm not going back with Maria because I know  
15 that he's asking me to go back with them for  
16 whatever reason. I don't know.

17 But I pretend -- I kind of, like,  
18 just make it about I can't go back with Maria  
19 because I can't make it look like I've said no to  
20 the Governor. So I'm like in this no win  
21 situation sitting in my fucking seat, waiting --  
22 like, I want to be with my team. Right? They're  
23 still going back and forth with me and Annabel and  
24 Stephanie come out from the side stage, staring at  
25 me and, like, look at your phone and they're

1 L. Boylan

2 giving me dirty looks, saying -- I said I'm not  
3 going and I don't go.

4 I don't know how I received the  
5 outreach, but I'm informed that he's angry with me  
6 and so I think I -- I think I sent him a  
7 Blackberry message or something -- I don't know  
8 how I send it -- but I said oh, I didn't realize,  
9 you know, you were going to be going, which is  
10 kind of a white lie, but as I had learned  
11 previously, you can't say anything critical to  
12 him. I had to make it seem like it was about  
13 something else and not about him.

14 That wasn't the scariest moment. As  
15 I said, the tour was, but that was, I think, the  
16 moment where on some level I knew I was never  
17 going to be able to win or succeed here because it  
18 didn't matter that I was doing my job. It didn't  
19 matter what my job was. Not only to him, but all  
20 of his staffers. It just mattered that I did what  
21 he said and he didn't care about me doing my job  
22 correctly and making him look good. He cared  
23 about me being some bizarre doll next to him and  
24 Maria Bartiromo and that was a big deal for me.

25 Q. You don't recall who conveyed to you

1 L. Boylan

2 that the Governor was unhappy that you didn't join  
3 him?

4 A. I'm sure Stephanie said something or  
5 communicated something. I mean, I grew up in a  
6 very passive aggressive family. I knew. You  
7 know, I received all the indicators and, you know,  
8 like, you would be not invited to the meeting the  
9 next day if people were unhappy with you. You  
10 would not be invited to the pool party, you would  
11 be not invited to that thing and to be not invited  
12 would mean that you weren't going to get to do the  
13 work that you wanted to do and to be that you  
14 weren't respected and you were going to get shit  
15 on.

16 So it wasn't just try to convey,  
17 like, why it was so important to me to be accepted  
18 by these women because it meant everything in  
19 terms of how things work. I've always been a  
20 weirdo, I've never tried to fit in, but in this  
21 dynamic, recreated an environment where you were  
22 just so thankful when someone was nice to you.

23 Q. When Stephanie and Annabel were  
24 saying you should take the helicopter ride back,  
25 what was your basis for saying they were doing



1 L. Boylan

2 that on behalf of the Governor?

3 A. They didn't even like me. That would  
4 be the only reason. Like they had one goal and it  
5 was to keep him happy and there would be no -- you  
6 wouldn't get to go on a flight with the Governor  
7 unless he liked you. I would never be on the  
8 helicopter with the Governor unless it was him who  
9 wanted me there. If you look at 80% of senior  
10 staff, they never flew with him on the helicopter.

11 Q. How many seats are on the helicopter  
12 by the way?

13 A. It's like a booth at a restaurant.  
14 It's not like a --

15 THE VIDEOGRAPHER: We're going to  
16 have to go off the record. Standby.

17 We are now off the record.

18 The time is 2:34 p.m.

19 (Recess taken)

20 THE VIDEOGRAPHER: We are now on the  
21 record.

22 The time is 2:46 p.m.

23 Back from break.

24 Q. Okay. We got a little cut off there.  
25 I was asking you how many seats there

1 L. Boylan

2 were in the helicopter and you got cut off, so why  
3 don't you start from the beginning?

4 A. Unlike the airplane, it's kind of  
5 like booths at a restaurant where you could  
6 probably accommodate, you know, a different number  
7 of people on either side. It's a booth facing  
8 each other. And I think typically at most for  
9 comfort you'd want three on each side, but it was  
10 typically less, fewer than that, more like four  
11 people or five people.

12 Q. Did you ever take any overnight trips  
13 with the Governor?

14 A. No.

15 Q. Did you ever take any trips outside  
16 of New York?

17 A. Outside of the State of New York?

18 Q. State of New York.

19 A. I don't think his plane ever -- I  
20 think there was one occasion because of bad  
21 weather we may have landed somewhere in New  
22 Jersey, but I'm not actually certain about that.  
23 Not know that I know of.

24 Q. I wasn't alluding to the Governor's  
25 plane.

1 L. Boylan

2 Did you ever take any trips with the  
3 Governor outside of New York State?

4 A. Puerto Rico.

5 Q. When did you go to Puerto Rico with  
6 the Governor?

7 A. I think I went twice when he went. I  
8 went, like, many times. I could probably zero in  
9 on that, but I don't know offhand. I know it was  
10 in my last year of service there and it's when I  
11 told you about the picture with the lower back,  
12 that occurred there.

13 Q. And did anything other than the  
14 picture happen in any of the trips to Puerto Rico  
15 with the Governor that you recall?

16 A. No. I mean he could be cruel in that  
17 I was co-managing this with [REDACTED], who I  
18 was friends with, but for probably a number of  
19 reasons, like I was used to presenting in a  
20 certain way, so he didn't want her to speak and  
21 present any of it, he wanted me to present all of  
22 it and I think that's the combination of  
23 unfairness and whatnot and he would do that kind  
24 of thing.

25 Then, you know, I would have to pick

1 L. Boylan

2 up the pieces and talk to her and, you know, like,  
3 well, I didn't even notice that, try to underplay  
4 it. But he would do stuff like that and could pit  
5 me and other women against each other.

6 Q. Putting aside Puerto Rico, other than  
7 what you've already described today, at any time  
8 has the Governor made any sexually suggestive  
9 comments to you?

10 A. Yeah. I mean, I think it was pretty  
11 regular and unfortunately, you know, every time I  
12 hear some anecdote in the different women who have  
13 spoken, like the dog thing I didn't remember that  
14 until it came up, but it was -- you know, it  
15 was -- I'm just trying to explain how pervasive it  
16 was.

17 We would have group meetings with ten  
18 people, all the senior staff, mostly events  
19 people. I would find a staff -- even though I'm a  
20 politician, I'm a relatively introverted, shy  
21 person. So I would -- and his glare is very scary  
22 in a way, so I would sit myself behind this lamp  
23 so he couldn't see me. On two different occasions  
24 he said in front of a room full of people "You  
25 always sit behind that lamp, so I can't see you"

1 L. Boylan

2 and he stopped the meeting and he moved the lamp  
3 on one occasion so he could stare at me. I'm just  
4 trying to explain how pervasive these things were.  
5 Like that alone is not -- but it was always.

6 Q. You talked about and you made  
7 reference to the time the Governor kissed you.

8 Did the Governor kiss you one time or  
9 more than one time?

10 A. One time. I mean, he -- okay, so,  
11 like, the woman who he met in the flooded town,  
12 like this, like -- and maybe, like, kind of  
13 awkward weird, like a side kiss or something like  
14 that, that happened a ton of times. But literally  
15 walking -- get up out of my seat in front of his  
16 desk to walk out and he comes in front of me and  
17 he kisses me as I -- and then I keep walking.  
18 This was, programmatically speaking, a kiss.

19 I had a ton of awkward weird physical  
20 interactions with him that I agree with that  
21 woman, he makes things weird and sexual and power  
22 oriented, but this was a kiss.

23 Q. This was in his Manhattan office or  
24 Albany office?

25 A. Manhattan.

1 L. Boylan

2 Q. Where was he and where were you?

3 Describe where each of you were.

4 A. He has this big phallic desk that he  
5 sits behind. He's the corner office and it's  
6 weird because you can see all of midtown out of  
7 the window. Even if it's so high, it feels like  
8 you're in front of millions of people in a way --  
9 right? -- and I'm sitting at the desk, I'm alone  
10 in a meeting. He would frequently call me in for  
11 a real purpose or a non-real purpose and one would  
12 never know, so you had to have your shit together.  
13 I would always come with, like, five different  
14 binds of shit to be ready. Right?

15 But this one, I don't even remember  
16 what the meeting was about. I get up to walk out.  
17 So there are two chairs at his desk that, you  
18 know, kind of face his desk. I back up my chair  
19 and then I turn this way and you have to go past  
20 that big phallic desk to get out of the office.  
21 And I believe the door was open to Stephanie's  
22 sitting area and as I'm walking out, he steps kind  
23 of in front of me and kisses me and it happened so  
24 fast, it was the weirdest thing. I just kept  
25 walking because my first thought is oh my god, oh

1 L. Boylan

2 my god, what if someone saw that and they're going  
3 to think that I wanted a kiss from the Governor.  
4 I'm just shocked. I'm not even afraid. The  
5 afraid was in his office in Albany. This was just  
6 the strangest shocking thing ever. I just keep  
7 walking really fast. She's not at her desk and  
8 then Staffer #5 -- whatever his last name is --  
9 is not at his desk.

10 I think by that point so many things  
11 had happened, it wasn't scary to me, it was kind  
12 of like oh my god, what a weird thing. It didn't  
13 even feel -- it was just weird.

14 Q. When he kissed you, did he put his  
15 hands on you anywhere?

16 A. Not that I recall.

17 [REDACTED]  
18 [REDACTED] [REDACTED]  
19 [REDACTED] I don't like physical contact, like  
20 sexual physical contact with people I don't know  
21 very well. So it was just kind of shocking and I  
22 just kind of kept walking.

23 Q. You said he blocked your path and  
24 kissed you.

25 Did you have to then walk around him

1 L. Boylan

2 to get out of his office?

3 A. No, not really that I recall. I felt  
4 like I didn't even stop walking. So it felt like  
5 I was here, I get up, coming out this way past his  
6 desk, he comes this way and does it and then I  
7 keep going. Do you know what I mean?

8 Q. I'm trying to picture this.

9 So he didn't stop directly in front  
10 of and you block your path?

11 A. It felt like he was in front of me,  
12 but I kept walking, so I think maybe it was off to  
13 the side in front of me and, like, the door wasn't  
14 right behind him. The door was -- it's like if  
15 there was a Y and I'm coming and he's, like, there  
16 and I keep going. You know?

17 MR. KIM: He kissed you on the lips?

18 THE WITNESS: Yes.

19 MR. KIM: How long did it last?

20 THE WITNESS: Not long. I never  
21 stopped walking. It was kind of this  
22 comically weird interaction to me.

23 MR. KIM: Did he say anything before  
24 or after?

25 THE WITNESS: No, that's why it was



1 L. Boylan

2 also weird.

3 BY MS. CLARK:

4 Q. Had you ever seen him kiss anyone  
5 else on the lips?

6 A. No.

7 Q. Have you ever seen him kiss any male  
8 staff members on the cheek?

9 A. No. Maybe, like, I could envision  
10 him doing it to a really old man, like his dad or  
11 something, like some weird dad/son thing, but no.  
12 No. That's my whole thing.

13 When Rich as a party says "Oh, that's  
14 how he is to staff." He was never that way with  
15 [REDACTED] he was never that way with Rob, he  
16 was never that way with Howard. He was never that  
17 way with other people, only women.

18 Q. Were there any other times where he  
19 tried to kiss you?

20 A. No. He would do the back thing a lot  
21 in pictures, but he never -- it was -- I didn't  
22 mistake it for anything. That's what it was. I  
23 was just -- I mean, it's hard to understand my  
24 fixation with being taken seriously now. I just  
25 worked so hard in my life to not ever have someone

1 L. Boylan

2 think that, like, I was in some way connected to  
3 this person. So that was my first thought, like  
4 oh my god, what if someone sees this happen and  
5 they think I'm doing this. You know?

6 Q. Did the Governor ever put his hands  
7 on your face, like you saw the picture at the  
8 wedding like he did that to woman?

9 A. Yeah, I think he did. Yeah. Like  
10 I've seen those extended too long interactions I  
11 think he probably did that a number of times.

12 Q. When he did that, did he kiss you or  
13 try to kiss you?

14 A. He tried to kiss me the two-cheek  
15 thing several times. But the lip thing, I don't  
16 remember him ever doing that to me.

17 Q. When he put --

18 A. My parents don't kiss me on the lips.  
19 I would know it. That's, like, a different thing  
20 to me.

21 Q. Did he ever kiss you the times he put  
22 his hands on your face?

23 A. No. I think he was weird -- with  
24 heels, I'm about as tall as he is, so I think  
25 there's that, too. I think he belittles people

1 L. Boylan

2 and that woman is quite petite and short is my  
3 guess, but he finds other ways to belittle me.

4 Q. Did you tell anyone about the kiss at  
5 the time it happened?

6 A. My mom. My mom. I called my mom  
7 right away. I said oh my god, kind of like you're  
8 saying, I can't believe this happened.

9 Q. Did you have any texts with your mom  
10 about it?

11 A. No. I would have called her. I  
12 actually didn't remember that I called her, but  
13 she said I called her and I trust her memory much  
14 better than I do mine. She's super anal.

15 Q. Did you tell your husband?

16 A. No, not immediately. I thought  
17 like -- I thought it would just infuriate him and  
18 I didn't need to calm my husband down. I needed  
19 to, like, figure out what I was going to do.

20 Q. Did you tell any of your friends?

21 A. No, not at the time. It just didn't  
22 even fit. It was the most strange thing ever.

23 Q. The kiss was sometime in 2018?

24 A. Yes, it was towards the end of my  
25 time.

1 L. Boylan

2 Q. Now, you've made reference a couple  
3 times to the Second Avenue subway.

4 Tell us a little more detail what  
5 happened on that occasion.

6 A. Well, my husband and I [REDACTED]  
7 [REDACTED] every year for New  
8 Year's, so, like, the power play that the Governor  
9 does, he doesn't really care about other people's  
10 lives and he literally last minute scheduled --  
11 like invited me and a bunch of other people to  
12 join this event on New Year's Eve.

13 So we come home early, my husband is,  
14 like, kind of miffed that he has to do that. I'm  
15 like it'll be fun, we can spend New Year's in the  
16 new subway, that's kind of cool. We get dressed  
17 up and we go there and there's like thousands of  
18 people and there are steps up, you know, like a  
19 subway line where there's downtown, uptown,  
20 downtown, uptown, right? And they basically  
21 stage, like, photographers and journalists to be  
22 at the top of the steps up from the lower level.  
23 Right?

24 So everyone is watching at some  
25 point. This is the formality of it. It's just

1 L. Boylan

2 him and Sandra Lee coming up those steps.

3 Literally just him. Not overdoing it, there's

4 probably hundreds of cameras on them. I'm off to

5 the side with my husband, watching. You know,

6 this is the event. And he sees me and he stops

7 proceeding upwards for the formality of the event

8 and he comes over -- I mean, this has to be

9 captured on a ton of cameras, I've said this, you

10 know, before -- but he comes over to me, he -- I

11 don't remember if he shook my hand or my husband's

12 hand first, but he did that hand thing and it was

13 a really long time and even if it wasn't a really

14 long time that he did that, we were the only

15 people he stopped to do that with and he did it in

16 front of all the cameras that were watching this

17 very formal moment and everything about that

18 freaked me out and I could tell Sandra Lee was

19 like -- we were all kind of like what the fuck.

20 Of course I don't read that on my face because

21 everything is just fine and everything is okay.

22 I'm surprised and kind of like

23 shocked by it, but I'm also not surprised because

24 he's kind of done this to me before and I've kind

25 of told my husband about that.

1 L. Boylan

2 He passes, we're getting on --  
3 because like part of the formality of this event  
4 was to ride the train once. So we get on the  
5 train and he looks at me and he says "You weren't  
6 kidding. That was one of the strangest things I  
7 ever experienced" and he's told a bunch of friends  
8 about it.

9 Q. You said he said it. That was your  
10 husband that said that to you?

11 You have to say yes or no.

12 A. I'm sorry. Yes.

13 MS. CLARK: Marco has appeared, so I  
14 think he needs to change the recording.

15 THE VIDEOGRAPHER: Standby. It'll  
16 take 30 seconds.

17 We are now off the record.

18 This is the end of media unit number  
19 two.

20 The time is 3:01 p.m.

21 (Recess taken)

22 THE VIDEOGRAPHER: This is the  
23 beginning of media unit three.

24 We are now on the record at 3:02 p.m.

25 Q. We were talking about the Second

1 L. Boylan

2 Avenue subway event.

3 When the Governor came over to where  
4 you and your husband were standing, did Sandra Lee  
5 stay where she had been, about to go up the steps?

6 A. Did she say where she'd been or where  
7 was she?

8 Q. Did she stay --

9 A. She stayed where she was, but she  
10 looked over. I mean, I don't know if you're  
11 speaking to her, but I -- she could probably tell  
12 you a mouthful about stuff she's seen.

13 Q. Do you have any knowledge about what  
14 she might have seen or are you just assuming or --

15 A. I'm just assuming, but it's a good  
16 guess.

17 Q. Did you ever sit in the Governor's  
18 lap?

19 A. No. That was apparently Senior Staffer #3.

20 Q. Did you see Senior Staffer #3 sit in the  
21 Governor's lab?

22 A. I never saw it. I mean, it makes me  
23 feel nauseous thinking about it, though.

24 Q. Did someone tell you about it?

25 A. Yes.

1 L. Boylan

2 Q. Who told you about it?

3 A. [REDACTED]

4 Q. What did he tell you about it?

5 A. He said there's a picture that exists  
6 with her sitting in his lap and he hasn't seen it  
7 either --

8 Q. Did he say where he saw or heard --

9 A. -- and it was on Instagram at some  
10 point.

11 Q. Did you ever see or hear about anyone  
12 else sitting in the Governor's lap?

13 A. No. No. But I wouldn't be  
14 surprised.

15 Q. Did you ever see or hear about  
16 Senior Staffer #2 sitting in the Governor's lab?

17 A. I would believe that.

18 Q. You'd believe it, but did you see or  
19 hear about it?

20 A. I didn't see or hear about it, no. I  
21 know they would all sit and drink with him at the  
22 restaurant, Docks, downstairs in the back room.

23 Q. Who would often drink with the  
24 Governor in the back room at Docks?

25 A. Melissa, Dani, Stephanie, Jill and



1 L. Boylan

2 Annabel.

3 Q. And would they go as a group or it  
4 would be like one night he'd go with one, one  
5 night it would be somebody else?

6 A. Group typically. Typically a group.

7 MR. KIM: Do you believe -- are you  
8 less surprised about Senior Staffer #2 sitting  
9 on his lap than Senior Staffer #3, for example?  
10 Is there a difference?

11 THE WITNESS: Well, the -- well,

12 [REDACTED]

13 MR. KIM: [REDACTED]

14 THE WITNESS: Sorry.

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 L. Boylan

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED].

6 Q. You said that [REDACTED] called  
7 them the Stepford Wives. Was it the Stepford  
8 Wives or was it something different?

9 A. You know, I'm wondering if I've  
10 confused -- [REDACTED]

11 [REDACTED] [REDACTED]  
12 [REDACTED] It may have been her that said  
13 it. It may not have been [REDACTED] But [REDACTED] was  
14 very aware of the Mean Girls. I could think of  
15 her name. She replaced Jim Malontris in this  
16 role. I can't remember her name offhand. I have  
17 blocked it out.

18 Q. She may have referred to them as the  
19 Sister Wives?

20 A. Yeah. Yeah, it was Sister Wives.  
21 Sister Wives. It wasn't Stepford -- I'm sorry.  
22 I'm going to a literary place. Sister Wives.

23 Q. Did you ever act in a manner with the  
24 Governor that you considered flirtatious?

25 A. There's a certain amount of, like,

1 L. Boylan

2 everything about him was flirtatious, so even the  
3 strip poker thing, me saying "Oh, just what I was  
4 thinking," right, there was a lot of that. I have  
5 a very dry sense of humor and you would never want  
6 him to walk away mad, so how do you play this off  
7 in a way that doesn't throw fuel at it, but  
8 doesn't make him angry. You know? So if you  
9 consider that flirtatious ...

10 Q. Can you think of any other examples  
11 where someone watching might view you as being  
12 flirtatious with the Governor?

13 A. I guess I would have to know what it  
14 is. I was always very yes, sir, of course, sir.  
15 Always. I was always trying rise to the occasion  
16 and keep him happy. But sitting on his lap and  
17 doing shit like that, never.

18 Q. Did you ever make any comments to the  
19 Governor about his appearance?

20 A. I talked a lot about his speeches  
21 because I thought, you know, he would ask for  
22 feedback on his speeches. He only wanted positive  
23 feedback, but I thought really highly of him for a  
24 very long time as the perspective of a leader and  
25 I would talk about those things. You know, those

1 L. Boylan

2 kinds of things, I was very positive.

3 Q. Do you recall ever making any  
4 comments about his appearance to him or ...?

5 A. Not that I know of.

6 Q. Did you ever have any sort of  
7 consensual romantic or sexual relationship with  
8 the Governor?

9 A. No. No.

10 Q. [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED] [REDACTED]  
14 [REDACTED]  
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L. Boylan

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L. Boylan

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BY MS. CLARK:



L. Boylan

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1 L. Boylan  
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L. Boylan

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[REDACTED]

Q. Did you ever go to any parties at the mansion?

A. The pool house with lots of people, yeah.

Q. And you made reference to the fact that you had given a photo related to one of those.

If you could look at tab ten, I want to ask if that's the photo you're referring to?

A. Yes.

Q. Take a look at it just to make sure.

A. I saw it already. It's the one where I'm looking at the debate screen.

Q. Yes, February 28, 2017.

1 L. Boylan

2 A. Yes.

3 Q. Who took that photo?

4 A. I assume it was the photographer for  
5 the night. This is the kind of example where,  
6 like, there was no purpose to have photos that no  
7 one could see, that I couldn't see. These were  
8 photos of us at a -- not at, like, a public event.

9 Q. How did you get this photo?

10 A. Someone sent it to me. I think John  
11 Majori said "Oh, this is a photo of you."

12 Q. Did he say whether he was sending to  
13 it to you on behalf of the Governor or do you have  
14 any sense as to whether the Governor --

15 A. No, no, I didn't think this was from  
16 the Governor. This was just an example of how,  
17 like, even when he wasn't watching you, he was  
18 watching you.

19 Q. If you could turn to the next tab,  
20 tab 11, do you recognize this document?

21 A. Yes.

22 Q. What is this?

23 A. This is how it would look like if you  
24 were invited to special events at the pool house  
25 and it was only, like, the special people who were

1 L. Boylan

2 invited.

3 Q. Do you recall what event this was?

4 A. No, I don't. I think it was their  
5 annual, like, wintertime holiday party. And I  
6 believe this was at the event when Stephanie  
7 showed me, like, there's a pool where FDR used and  
8 she said "Have you ever swam here?" I said "No, I  
9 never swam here." I didn't even know it was here.  
10 It was cool to see because with, you know, with  
11 FDR being in a wheelchair, it was interesting to  
12 see his, like, medical pool, but it was a weird  
13 interaction.

14 But this was just an example of how  
15 you would be invited and it was, like, a small set  
16 of people and you really wanted to be included, so  
17 you were part of the event. But yeah, I'm just  
18 showing an example of the pool party environment.

19 Q. Did anyone ever tell you that they  
20 went to any party at the pool where they went  
21 swimming?

22 A. Stephanie said "Have you swam here?"  
23 like she had, but I never knew anything more  
24 beyond that.

25 Q. And you mentioned earlier being in

1 L. Boylan

2 the mansion at a meeting with Robert Mujica  
3 upstairs.

4 Were there other meetings you  
5 attended at the mansion?

6 A. Yeah. Yeah. Like the Tesla meeting  
7 I told you and occasionally like there would be a  
8 staff kind of meeting. One time there was one  
9 where a bunch of the people were invited before  
10 Puerto Rico and another time, there was a smaller  
11 set of people, like only the senior staff and it  
12 was a weird environment because he -- we were in  
13 the smaller side room, if you come in into the  
14 left, there's, like, a little sitting area and  
15 everyone had a drink. I think he was eating  
16 dinner, but Rob was going to sit next to me on the  
17 couch.

18 And as I told you, I really liked  
19 Rob, I trusted him and I thought he was a decent  
20 person and, you know, trying to help me fit in  
21 there. And he got -- he was about to sit down and  
22 he got up because he saw the Governor looking at  
23 him. The Governor came and sat down next to me at  
24 the couch and everyone else was seated somewhere  
25 else. It was clear that he was supposed to get to

1 L. Boylan

2 sit next to me. It was weird because everyone was  
3 just kind of watching him and him talking to me  
4 and that was weird on every level.

5 Q. How close to you did the Governor --

6 A. He wasn't that close. It was just  
7 the focus was weird and that Rob was going to sit  
8 next to me, he was my buddy, I didn't -- he didn't  
9 scare me, he didn't present a power relationship  
10 over me, he wasn't taller than me. I'm taller  
11 than he is. That's very different than my  
12 interactions with the Governor and he was about to  
13 sit down and the Governor must have given him a  
14 look because he got up or, like, he was about to  
15 sit down and moved over and the Governor sat next  
16 to me.

17 Q. Was there anything inappropriate or  
18 unusual about your conversation with the Governor  
19 when he sat down?

20 A. Just how he was focused on asking me  
21 questions or engaging with me. I don't remember  
22 anything particularly inappropriate. It was weird  
23 and inappropriate the focus that was put on me.

24 Q. Did you ever talk to Rob about that  
25 interaction?

1 L. Boylan

2 A. No, because as much as I liked him,  
3 you know, the one time I did open up to him was  
4 when I, like, had just started in the role and,  
5 you know, I had felt like nowhere was safe and  
6 being inside didn't make it any better than being  
7 outside. So I went to his office and I was crying  
8 and I said, like, I don't think I can do this and  
9 he said well, you gotta figure it out. A lot of  
10 it at that point was, you know, in part about  
11 Melissa. But that was the only time I really  
12 opened up to him.

13 Q. Did he give you any other advice?

14 A. No.

15 Q. I'm going to ask you to turn to tab  
16 12.

17 A. I mean, come on. Why does it matter?  
18 What is this?

19 Q. I've just got to ask you --

20 A. Honestly, this kind of pisses me off.  
21 The Governor of the State of New York and you're  
22 asking me to explain why I tweeted that I was  
23 proud to work for him. I don't understand it.

24 Q. I just want to give you a chance  
25 to --



1 L. Boylan

2 A. What is it? Is this about me or is  
3 this about the Governor?

4 Q. We want to be able to  
5 explore everything and allow you --

6 A. What is it that you need to explore  
7 about my tweet saying that I was proud to work  
8 there? Think of it like gymnastics. You worked  
9 your whole life to get to the Olympics, there's no  
10 other Olympics, there's nowhere else to go. If  
11 you get out and you piss them off, you're dead and  
12 all of your hard work is gone. Why am I  
13 explaining my tweet about working there? How is  
14 this new to you?

15 Q. Do you want to take a break?

16 A. I don't understand why -- this is the  
17 kind of stuff Women for Cuomo ask me on Twitter.  
18 This isn't the kind of stuff smart lawyers who are  
19 experienced with people experiencing sexual  
20 harassment ask.

21 Q. I'm not asking any accusations --

22 A. This is the kind of shit that his  
23 team would send me. This is literally what Women  
24 for Cuomo post on my Twitter page.

25 Q. I'm not trying to upset you.

1 L. Boylan

2 A. It is upsetting. It is upsetting.  
3 It's victim blaming.

4 MS. BASINGER: Anne, do you mind if  
5 we go off the record and I speak to Lindsey?

6 MS. CLARK: Sure, you could do that.  
7 I was suggesting a break anyway. You could  
8 talk with Lindsey. Let's take ten minutes.

9 THE VIDEOGRAPHER: We are now off the  
10 record at 3:23 p.m.

11 (Recess taken)

12 THE VIDEOGRAPHER: We are now on the  
13 record.

14 The time is 3:35 p.m.

15 Q. At any point if you need a break for  
16 any reason, just to clear your head, just say so.  
17 We could obviously accommodate that.

18 A. Thank you.

19 Q. Before the break, with the tweets, as  
20 you said, people have used your tweets to attack  
21 you. We are not looking to attack you. We want  
22 to give you an opportunity to say in your own  
23 words, and you started to, to say why after these  
24 incidents before December of 2018 you had posted  
25 publically positive things about the Governor.

1 L. Boylan

2 A. Sure. So, you know, looking at it  
3 now, it feels insane to read, but I think the  
4 extent to which this person has succeeded at  
5 momentarily destroying my life and controlling so  
6 many people's lives says a lot about one's ability  
7 to be in this place and have him as an enemy. I  
8 was working there at the time and I couldn't even  
9 fathom anywhere to go outside of working there,  
10 which is the same reason that when I was running  
11 for Congress and I hadn't yet announced, but I was  
12 exploring running for office, I connected with  
13 [REDACTED] because I knew that [REDACTED] was a  
14 representative of the working for -- for the  
15 Governor's voice. He was always nice enough to  
16 me.

17 I conveyed to him that I was  
18 interested in running for office and he said to me  
19 "Lindsey, the Governor loves you" and then he  
20 corrected his words, which I just thought was so  
21 weird to begin with because, you know, he said  
22 "Oh, he supports you" and then I thought the whole  
23 thing was so weird because I was finally away from  
24 this person, I had left, it had been very  
25 difficult for me, I was trying to strike out on my

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2 own and still somehow I was still under his thumb  
3 in this way.

4 So, you know, there is no -- when I  
5 was a little girl, everything about what I wanted  
6 to do in this world was to help make people's  
7 lives better and focus on people in pain in public  
8 service and there's nowhere to go if you create  
9 him as an enemy and I wasn't able to or strong  
10 enough to do it then and it really took hearing  
11 another woman's experience that was very much the  
12 same as mine where one I had more sympathy for  
13 myself in this dynamic because I had so much  
14 sympathy for her and then two, I felt so  
15 responsible for what had happened to her, so at  
16 this point, I'm still chugging along, thinking how  
17 do I get along in this world that belongs to this  
18 Governor and it took a very long time for me to  
19 change that, so that was where this was coming  
20 from.

21 Q. Thank you.

22 You talked about a conversation you  
23 had with Rob Mujica where you were sort of talking  
24 about how stressful and difficult it is.

25 Did you ever tell anyone in the

1 L. Boylan

2 Executive Chamber directly or indirectly about any  
3 of the incidents with the governor at the time?

4 A. No. You couldn't trust that group of  
5 people.

6 Q. Who is [REDACTED]?

7 A. He was originally -- he was more  
8 senior than I and he was, like, the staffer to Jim  
9 Malontris, but then when Jim left, he was kind of  
10 absorbed into ESD and I think he was more of a  
11 liaison between Chamber and ESD, so in some ways,  
12 he was more senior and then ultimately, when I  
13 became Chief of Staff and especially when I became  
14 Dep Sec, I would say I was more senior to him. I  
15 thought we had a good relationship, but he -- I  
16 mentioned -- when I spoke to Ronan Farrow that I  
17 vividly remember an occasion where I told him  
18 that -- I guess I did kind of tell someone -- I  
19 told him that I was waiting for a meeting with the  
20 Governor, I believe in his office area, and I said  
21 "I'm afraid" and he said "You do this stuff all  
22 the time. You're fine."

23 You know, kind of like, how, you  
24 know, you got this and I said "I'm afraid because  
25 of, you know, how the Governor treats me and how

1 L. Boylan

2 he likes me" and he said "Oh, I thought he liked  
3 blondes."

4 Now, I vividly remember this. Ronan  
5 Farrow reached out to him and said he had no  
6 recollection of that, so, you know, I'll take that  
7 at face value, but it happened.

8 Q. Back when you were in Chambers, was  
9 any sexual harassment training done?

10 A. No.

11 Q. What's that?

12 A. The whole building is sexual  
13 harassment.

14 Q. But there was no annual even just --

15 A. No.

16 Q. Did you have any knowledge about any  
17 policies or procedures in place to deal with  
18 harassment?

19 A. There was no HR.

20 Q. Is there anyone that handled any of  
21 the sort of functions that in a normal place would  
22 be handled by HR?

23 A. You know, I'm sure that, you know,  
24 you've heard that I left and there was a lot of  
25 tension and the fact that Alfonso was somehow

1 L. Boylan

2 playing this role I think says everything about  
3 the existence of an HR office.

4 Q. We'll come to that in a moment.

5 Did you ever consider trying to file  
6 some sort of complaint against the Governor while  
7 you were there?

8 A. JCOPE is staffed by the Governor. I  
9 was senior enough to know exactly how everything  
10 works.

11 Q. Had you ever -- go ahead.

12 Did you ever hear of anyone who tried  
13 to make any sort of complaints against the  
14 Governor?

15 A. Against the Governor? No. They  
16 would be destroyed before they even stepped out  
17 the door.

18 Q. Did you hear of anyone try to make  
19 any complaint or making any complaint against  
20 anyone else in a sort of senior position in the  
21 Chamber?

22 A. No. I mean, the first person that  
23 there would be a complaint against would be  
24 Melissa for her toxicity. That tells me  
25 everything I need to know about whatever this

1 L. Boylan

2 fucking personnel file is. It's not a research  
3 file.

4 Q. You mentioned Alfonso David.

5 Did you have any discussion with  
6 Alfonso David about any issues that you were  
7 having --

8 A. With the Governor?

9 Q. Not the Governor, but any other  
10 employment-related matters.

11 A. No. Other than he asked me that  
12 question, not that I recall.

13 Q. Did you ever talk to anyone about any  
14 issues that you were having with any of your  
15 colleagues or anyone who worked at ESD?

16 A. Well, at the end, if that's what  
17 you're talking about, near to when I left, I had  
18 asked --

19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]



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1  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED] -- the second-to-last day  
19 I was there, I received a -- like an invite from a  
20 meeting with Alfonso. Already, I'm like well,  
21 that's weird. I go into the meeting and there's a  
22 bunch of lawyers there and it's about how I was  
23 mistreating her and other people and I just knew  
24 that the whole set up of that, given how the whole  
25 Chamber operated and that that meeting would never

1 L. Boylan

2 happen unless it was someone that they wanted to  
3 get rid of.

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 [REDACTED] -- so I  
9 just said I'm done, I can't do this anymore, I  
10 can't do this, I can't do the pressure, [REDACTED]  
11 [REDACTED], [REDACTED]  
12 [REDACTED] because of the stress and the fear  
13 and I just quit.

14 So if you mean, like, did he ever get  
15 engaged, the last day of my employment there was a  
16 meeting where he said that I was being aggressive  
17 to her and other employees and I said, you know,  
18 there's nowhere to go from here.

19 Q. You said it was a room full of  
20 lawyers.

21 Who else was in the room?

22 A. There was one on the phone, which I  
23 think was Camille, the woman who now heads JCOPE  
24 as an independent leader. Camille Vralick. In  
25 the room, I think maybe there was -- the only

1 L. Boylan

2 lawyer that I have some modicum of respect for  
3 is -- I don't remember her name. I could find it.  
4 She was actually like a real ethics lawyer kind  
5 of.

6 Q. Was it Julie?

7 A. Coopiyak, yes.

8 Q. Do you recall what Alfonso David said  
9 with regard to the accusations?

10 A. There were allegation that I was mean  
11 to my staff and that I shouldn't have -- first he  
12 said that I shouldn't have handled this directly.  
13 I said fine, I'll give you that. No problem. I  
14 shouldn't have even had to deal with her after we  
15 had that escalation [REDACTED]

16 [REDACTED] I said okay.

17 But then he said well, there's these  
18 other cases of women who are, you know, not -- who  
19 said that you weren't nice. First of all, I never  
20 had a bad performance review when I was at ESD.  
21 I'm sure I ruffled some feathers. I'm sure I  
22 pissed off some people and, you know, I probably  
23 did -- was not nice to someone here and there, I'm  
24 sure. But the way that it was set up was a set  
25 up.

1 L. Boylan

2 So, you know, I received the message  
3 about what this was, which was there's no way for  
4 me to be in this place.

5 Q. Other than [REDACTED]  
6 [REDACTED], did he identify  
7 anyone that claimed you were being --

8 A. No. He said there were others, but  
9 it was never identified. I was never informed of  
10 who it was. I tend to feel like I could probably  
11 explain some context if there was someone, or if I  
12 was mean to someone, I'm sorry.

13 You know, under my leadership, I  
14 elevated more women and minorities in terms of  
15 salary increases and in promotions than I think  
16 anywhere else in the agency. [REDACTED]

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED] So, you know, I don't want  
20 to negate what someone may have said that I didn't  
21 do right. I just didn't know who it was, so ...

22 Q. Did he ever ask you about any of your  
23 interactions with Senior Staffer #1 [REDACTED] ?

24 A. No.

25 Q. Did he ask you about any of your

1 L. Boylan

2 interactions with Senior Staffer #2 ?

3 A. No.

4 Q. Did you ever call Senior Staffer #2  
5 stupid or ineffective or anything along those  
6 lines?

7 A. Ineffective, yeah.

8 Q. Did you say that to her or about her  
9 or --

10 A. I'm sure I called her ineffective. I  
11 never called her stupid. I probably said she was  
12 stupid in passing or something like that was a  
13 stupid remark. She would be calling me five or  
14 six times in a day in the same time that the  
15 Governor was calling me about information that I  
16 couldn't get to her any faster and she didn't  
17 understand anything that was going on, she was  
18 just yelling at me without actually understanding  
19 things like the Penn Station project.

20 Q. Did he ask you about you throwing  
21 anything at anyone?

22 A. I've never thrown anything at anyone  
23 ever.

24 Q. Did he ask you about that?

25 A. No. And I've never done that.

1 L. Boylan

2 Q. Did he or anyone else in the meeting  
3 ask you about [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 Q. Did they --

13 A. How do I -- that's a protected --  
14 none of these things were ever communicated to me.

15 Q. I'm just trying to find out what was  
16 discussed at this meeting. I'm not lobbing  
17 accusations at you. I'm trying to ask if things  
18 were asked.

19 Did they discuss at all at this  
20 meeting whether you were up to date in putting in  
21 your paperwork on travel expenses?

22 A. They may have mentioned that I was  
23 behind and it was because [REDACTED]

24 [REDACTED]

25 Q. So they started asking these

1 L. Boylan

2 questions.

3 Did you say you were resigning or  
4 what did you say in response when he started  
5 talking about these things?

6 A. I think I said, you know, I gotta  
7 think about if I want to be here and then I think  
8 I said, you know, if I do leave, you should  
9 promote [REDACTED] because she's really incredible. I  
10 think that's what I said. Then I went back to my  
11 desk -- something like that.

12 Then I went back to my desk and  
13 instead of the three times where I had tried to  
14 quit and, you know, it was, like, pushback and  
15 people wanted me to be there, I sent Melissa an  
16 email where I said "I hope you use your leadership  
17 to help women." I think I sent Alfonso an email  
18 saying "Got it. This is my last day" and then I  
19 sent my mass email to all of Chambers saying "This  
20 is my last day. Thank you so much. It's been a  
21 pleasure" or something like that because I wanted  
22 it out there because once it was out there, it was  
23 not retractable.

24 Q. You mentioned a couple times that  
25 there were prior times that you tried to resign.

1 L. Boylan

2 How many times was that?

3 A. That was ultimately I think my third.

4 Q. Were those all in 2018?

5 A. Yes. Also, you know, [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED] I thought about just resigning then,  
10 too. So it probably would have been four.

11 Q. The time after the incident, did you  
12 talk to anyone about resigning or just think about  
13 doing it?

14 A. [REDACTED]  
15 [REDACTED], but no, I didn't. No. But I got past it.

16 Q. When is the next time that you  
17 thought about resigning or talked to somebody  
18 about resigning?

19 A. March. No, no, no. So my husband  
20 and I do an annual anniversary trip for, like,  
21 when we got engaged and we go to [REDACTED] every  
22 year and I was calling my friend [REDACTED] and I was  
23 like "I don't think I can take this environment"  
24 and she said [REDACTED]

25 [REDACTED] [REDACTED]



1 L. Boylan

2 [REDACTED]  
3 [REDACTED]  
4 Q. When is the first time you talked to  
5 anyone in the Chambers about resigning where they  
6 said no, no, stay or things along those lines?

7 A. Where they really, like, expressed  
8 and everyone knew is probably that exchange that  
9 you have with Melissa DeRosa, around that time.

10 Q. Why don't we turn to tab 16?

11 A. Yes, that one.

12 Q. So this is looks like July 25th,  
13 2018. So she wrote "Call me fast" and then you  
14 wrote "Just tried you" and then she wrote "i know  
15 it was a tough day today."

16 A. Yes.

17 Q. What happened that day?

18 A. I believe this was the day where she  
19 called me and said "What the fuck did you do?" and  
20 I hung up the phone on her and said "No one talks  
21 to me like that."

22 Q. Did you after this exchange speak to  
23 her?

24 A. I don't actually remember actually  
25 talking.

1 L. Boylan

2 Q. She says "We hope to see you back  
3 here tomorrow."

4 Did you say that you were going to  
5 quit or did you leave early or something -- I'm  
6 sorry --

7 A. Yes, I left early and said I was  
8 going to quit.

9 Q. Did you say that to Melissa or did  
10 you say that to somebody else?

11 A. Honestly, I don't remember. It was a  
12 very tough time.

13 Q. After this exchange, did Melissa say  
14 anything to you to try to -- beyond this to try to  
15 get you to stay?

16 A. I mean, I've had -- I went back the  
17 next day, I think. So once you're, like, back in,  
18 she's back to her old self, so no.

19 Q. When's the next time that you talked  
20 to anybody about resigning?

21 A. I think I -- you know, I think I must  
22 have actually done it earlier in the summer. You  
23 know I mentioned to you about Rob, when I told him  
24 I didn't think I could do this.

25 Q. Right.

1 L. Boylan

2 A. That was actually pretty early on  
3 when I got the job, so I would say that was late  
4 spring, then there was this and there was one  
5 other time, but I don't remember what it was. And  
6 then there was when I left.

7 Q. When you left after you send out  
8 your -- first of all, when you sent the email to  
9 Melissa --

10 A. Actually, that sounds about right,  
11 the Rob, then this one and then, you know, I leave  
12 and I think it's the end of September.

13 Q. So you described after your meeting  
14 with Alfonso David that you sent an email to  
15 Melissa DeRosa.

16 Did she ever respond to you?

17 A. Your whole thing is deleted when you  
18 leave immediately.

19 Q. Did she ever try to contact you  
20 personally?

21 A. No.

22 Q. After you sent out your mass email,  
23 did anyone else get in touch with you about your  
24 departure?

25 A. Yeah, I think a ton of people were

1 L. Boylan

2 shocked and then if you were really close, you  
3 weren't shocked. So people like [REDACTED]  
4 reached out to me. She knew in, like, two  
5 seconds. [REDACTED]

6 [REDACTED] [REDACTED]  
7 [REDACTED]

8 Q. What was [REDACTED] position?

9 A. [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 Q. Did anyone from the Chamber ask you  
13 to reconsider your resignation?

14 A. No. I was still talking with Rob.  
15 So the other thing I was like I don't need this  
16 and my husband were going on our actual  
17 anniversary of we got married trip shortly  
18 thereafter, so I'm on this trip and -- what  
19 happened, but I was like is my life over if I,  
20 like if I end it this way and if I don't, like,  
21 try to put some pieces together, how am I going to  
22 do this? Like I don't -- you know, like, is my  
23 life over? There's no other place to go than this  
24 place, there's no other place than working for the  
25 Governor. And I talked to Rob and I said well, if

1 L. Boylan

2 there was, like, a way where it would be different  
3 and I don't have to, like -- you know, like, if  
4 there's a different reporting line where I can  
5 just, like, do the work that is important and not  
6 be in that, I would come back, you know, and he  
7 was like oh, I'll talk to him and see and he came  
8 back and said I don't think it is possible.

9 And at that point -- and I did say to  
10 him I was like I feel like my life is over because  
11 there's nowhere to go. He said your life isn't  
12 over, it's just beginning and I thought that was  
13 nice. And I emailed I think Alfonso in the group  
14 and I said, you know, this is my formal  
15 resignation because they were, like, asking for  
16 some form or I was supposed to sign something and  
17 I just said this is the final, like I'm done and  
18 then I got to formal you're out, you've resigned  
19 thing.

20 Q. After the meeting with Alfonso David,  
21 did you have any phone calls with him about  
22 returning?

23 A. No. If I had had a good conversation  
24 with Rob, I was going to follow up with Alfonso  
25 and discuss it, but no, that never happened.

1 L. Boylan

2 Q. Did you ever ask Alfonso sort of  
3 along the lines of what you asked Rob, is there  
4 some way I could come back or --

5 A. Rob was the friend that I kind of had  
6 there, so it was through him.

7 Q. Did you ever communicate with the  
8 Governor in any fashion about your departure?

9 A. Yeah, because I on some level -- and  
10 I still believe not that I was a perfect, like,  
11 manager or something, but that this process never  
12 would have happened without him and I wondered if  
13 I had not handled the interactions with him in a  
14 way that he was -- I kind of thought this was  
15 coming from him because nothing happens without  
16 his imprimatur and I said, like, why would -- you  
17 know, like, what is this? Why is -- this is  
18 bullshit. You know, that's kind of my MO. It's  
19 pretty, to the extent that I can, be direct. He  
20 said "I didn't even know, you didn't even say  
21 anything." I said that's strange. Like I  
22 don't -- you know, I was still -- I have  
23 complicated feelings about my time there.

24 I got to oversee all of this recovery  
25 work in Puerto Rico. I got to do really important

1 L. Boylan

2 work. I got to meet really cool people. It just  
3 all came with this other side that was really  
4 terrible, you know, so I was conflicted. Right?  
5 And if that's the only powerhouse in the world,  
6 there's nowhere else to go.

7 So yeah, I said well, I'll see if I  
8 could, you know, work it with Rob so I could -- I  
9 didn't want to have my life be destroyed by these  
10 people or have to go into a completely -- why  
11 should I have to give up everything that I'm  
12 passionate about when I've worked so hard and  
13 isn't there another way to do this. You know, so  
14 that's where I was coming from in that and  
15 engaging after the fact.

16 Q. That was the conversation with Rob.  
17 Did you ever communicate directly  
18 with the Governor about why you left?

19 A. Yes, I said this is bullshit. Like  
20 this would never happen to Melissa. This is the  
21 most toxic environment I've ever been in. At this  
22 point, I was not saying to him directly "You  
23 sexually harassed me. You know, you did these  
24 things to me." You could never really say it to  
25 him. It really wasn't -- I said toxic environment

1 L. Boylan

2 after I eventually had some distance, it was toxic  
3 for women, but I couldn't get to that last point  
4 in the accusations until I talked to a woman who  
5 had basically exactly my experience, with  
6 Charlotte. Right?

7 So at that point, it was about, like,  
8 this is ridiculous, this is the most toxic world  
9 I've ever been in. Melissa is, like, the meanest.  
10 All these women have been mean from day one. The  
11 fact that I had this meeting set up was a set up  
12 and that's it. That's how I felt. Not that I'm  
13 not culpable or you never not fucked up a  
14 situation or a dynamic with someone, but I felt  
15 that that was intentional and he said "No, it  
16 wasn't, I didn't even know you were leaving."

17 So I don't know what's true or not,  
18 but that was the substance of my interaction.

19 Q. Was that in person or by phone?

20 A. Never again.

21 Q. I'm sorry. What's that?

22 A. I never have seen him ever again.

23 Q. This was a telephone call?

24 A. I think it was a text exchange.

25 Yeah, I think it was some kind of text exchange.



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2 Q. Do you still have --

3 A. Blackberry by -- not before my  
4 Blackberry. No. I don't --

5 Q. When was it in relation --

6 A. Right in that time. Right in that  
7 time when I decided to leave.

8 Q. Did you reach out to him or did he  
9 reach out to you saying I just heard about your  
10 resignation?

11 A. I was like this is bullshit, like I  
12 was pissed on some level. I wasn't ready to  
13 direct all of it, like what really happened. I  
14 don't think I really absorbed it and how it felt.  
15 But the overall was bullshit and as I think you  
16 have an interest in talking to me, I've been  
17 pretty direct with people. You know? It was kind  
18 of like that.

19 Q. After you left the Chambers, you ran  
20 for Congress, correct?

21 A. I took a few months off, but yeah.

22 Q. And you're currently running for  
23 Borough President; is that right?

24 A. Yes.

25 Q. Have you had any paid employment

1 L. Boylan

2 since you left the Chambers?

3 A. No.

4 Q. I'm trying to get a sense of what  
5 else you've been up to since you left.

6 A. It's been really pretty busy. I've  
7 worked harder running for office than I worked  
8 for, you know, I mean, it's exhausting.

9 Q. I did not mean to suggest -- I just  
10 wanted to make sure I wasn't missing anything in  
11 terms of what you've been --

12 A. No, I mean one of the great things  
13 about -- this is the duality of my experience.  
14 One of the great things about the experience I had  
15 was I got to do really important things at a high  
16 level and you don't just get to do that, you know,  
17 unless you kind of run your own show or do  
18 something like that. So I wasn't just going to go  
19 back and work in, you know, a corporate  
20 environment. There wasn't something else I was  
21 interested in. This is what I'm interested in.

22 So it was more about how do I figure  
23 out a way where I can do this on my own  
24 authentically, work on improving myself and work  
25 on what I care about authentically and ultimately,

1 L. Boylan

2 that led me to run for office and then it was how  
3 to do I get started with this, so it took a few  
4 months and -- yeah.

5 Q. Other than the pin or text exchange  
6 with the Governor you just described, have you had  
7 any communication with the Governor since then?

8 A. When I officially -- right around the  
9 time I officially announced that I was running for  
10 Congress, like before I had talked to Bill and  
11 kind of asked for the blessing -- because you  
12 can't, you know, like you can't go forward like --  
13 I wanted to know are they going to try to screw me  
14 over, which he communicated to the Governor wasn't  
15 in essence, although I learned later that Melissa  
16 did try to screw me over personally, but I think,  
17 you know, who knows what's what.

18 I sent a thank you card for my time  
19 from because there's no other world. There's no  
20 other way to be, right? And I didn't want to have  
21 an enemy and I wanted to be the perfect -- I  
22 wanted to be the person who does everything  
23 they're supposed to and doesn't have any enemies  
24 and just does the job. But that was the last -- I  
25 sent a thank you and I never heard back. So

1 L. Boylan

2 obviously, he's the Governor.

3 Q. And you said that you heard that  
4 Melissa DeRosa called Jerry Nadler's campaign and  
5 was saying bad things about you.

6 Who told you that?

7 A. [REDACTED]

8 Q. And did he tell you what sort of  
9 things Melissa DeRosa was telling him?

10 A. No. I said I didn't want to know.

11 Q. Between the time you stopped working  
12 for the Executive Chamber and mid December of  
13 2020, is there anyone else in the Executive  
14 Chamber that you had any contact with?

15 A. Yeah. I mean, I think you have some  
16 things you want to run through here, right?

17 Q. There might be things I don't know  
18 about, so I'm just asking you who --

19 A. Let's see how much we can nail with  
20 one thing. My personality, once I decided to  
21 occupy the field of making this difficult choice  
22 and fucking up my whole life for a little while --  
23 or messing -- excuse me -- messing up my whole  
24 life for a little while, I wanted to see if  
25 whatever way I could I could encourage these

1 L. Boylan

2 people who had been bystanders or willing  
3 participants in such a big abusive environment to  
4 do the right thing. So when these things  
5 happened, I absolutely reached out to people.

6 Q. Before you started your tweets in  
7 December that started this all, between the time  
8 you left in September of 2018 and, say, early  
9 December 2020 --

10 A. I'm not really interested in going  
11 back on my relationship with Melissa, but because  
12 I knew that she had messed with my campaign or  
13 tried to, I was pretty pissed about something with  
14 the voting decision that they had made and I,  
15 like, texted her and maybe Dani about it.

16 At the same time, I had also  
17 secured -- helped secure -- a million masks for  
18 the State of New York through a business contact.  
19 So as much as this may be, like, their attempt to  
20 say that, like, I built up this huge thing to,  
21 like, get back, you know, I think actions speak  
22 louder than words.

23 Q. Is there anyone you were friendly  
24 with after you left the Chambers that you stayed  
25 in touch with?

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2 A. For a while I was friendly with Rob  
3 and I was appreciative that he had been you know  
4 helpful and tried to put, you know, a positive  
5 outlook. I was really appreciative. But how he  
6 dealt with all of this stuff, I could just never  
7 forgive him. A lot of, like, the underlings, very  
8 close, you know, like, you know, very good  
9 relationship, but a few have reached out, like I  
10 can't be public, but I, you know, I support you  
11 and thank you for what you're doing. That kind of  
12 stuff. But none of those senior people, no.

13 Q. You mentioned the issue with Melissa  
14 DeRosa and the voting thing.

15 What is that a reference to?

16 A. I don't even know. I kind of like --  
17 you have -- I scanned these things and I got the  
18 sense from a story that they were trying to plant  
19 that there was this -- they're trying to create  
20 this bigger narrative, that I, like, had an ax to  
21 grind and that it's exemplified by me texting  
22 Melissa and Dani about something they did with  
23 petitioning when I was running for Congress.

24 But there's nothing bigger than me  
25 thinking that they would do things to screw me

1 L. Boylan

2 over and it's not that far from the truth, given  
3 the fact that Melissa released this supposed  
4 personnel file, tried to screw up my Congressional  
5 race, tried to get newspaper stories to cover the  
6 personnel thing, tried to get Brad Hoylman as much  
7 support from unions vis-a-vis me in this race.

8 So as much as it may sound extreme,  
9 it's not that extreme when you realize what's  
10 actually occurred that's been documented  
11 publically.

12 Q. What's your knowledge about what  
13 role, if any, Melissa or anyone else from Chambers  
14 had in getting unions to back Hoylman over you?

15 A. Just what I read in the newspaper.

16 Q. So in December of 2020, you tweeted  
17 some things in more general terms about working  
18 for the Governor's office.

19 What made you decide to send those  
20 out there at that point?

21 A. Well, I had, you know, if you have my  
22 tweets, I had said that it was a toxic environment  
23 like a year and a half before that on Twitter.

24 And Melissa, again, had been asked -- Melissa had  
25 asked Jim Alatriss to negate me and say I heard

1 L. Boylan

2 someone Twitter bombing about, you know, being a  
3 working parent in Chamber and here's how great it  
4 is to be a dad in Chamber. Well, that's not the  
5 same thing as being a woman in Chamber.

6 But I had mentioned this a year and a  
7 half before that. So my only point here is to say  
8 that I had been speaking about a toxic environment  
9 for women for a long time and on some level trying  
10 to get my story out there, but I wasn't ready to  
11 go all the way and look at how the pushback was.  
12 Right?

13 Fast forward to the fall or, you  
14 know, December 2020. I now know how to use  
15 Twitter. I used it a lot for the whole campaign.  
16 It's one of those innocuous questions, "What's the  
17 worst job you ever had?" and on that I tweet, you  
18 know, working for the Governor, blah, blah, blah,  
19 blah, blah, toxic for women, it was a more  
20 respectful environment when I waitressed at  
21 Friendly's as a teenager.

22 I had tweeted those kinds of things  
23 before that moment, but for whatever reason,  
24 some -- it was either the Post or the Daily News  
25 decided to pick it up and everyone in the press



1 L. Boylan

2 saw it. Right?

3 That was when Charlotte reached out  
4 to me because she had seen the press coverage and  
5 she DM'd me and she said "Thank you so much for  
6 writing about this toxic environment. It was  
7 toxic for me and I was actually sexually harassed"  
8 and I had not mentioned being sexually harassed by  
9 the Governor, not mentioned that at all. And she  
10 told a little bit of the story, she was a young  
11 woman, so I said -- I called her, we had a  
12 conversation and, you know, I told her none of  
13 this was her fault. As much as she didn't feel  
14 like she could get out of it, she didn't feel  
15 like she could -- you know, there was no way out  
16 with regards to what she did in a way and how it  
17 kind of derailed her life. I knew exactly what  
18 she meant. It derailed my life on so many ways  
19 that I'm only beginning to understand and not only  
20 did I feel really guilty that I hadn't done  
21 anything about it and prevented it from happening  
22 to her, but I had more sympathy for myself because  
23 I said oh, maybe this is -- maybe I'm not, you  
24 know, shameful that I couldn't fix this, that I  
25 couldn't make him believe in my talents or -- that

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2 I couldn't -- I didn't know how to stop it.

3 I'm sitting with that feeling and,  
4 you know, the next day or so, I wake up and Andrew  
5 Cuomo is being floated for Attorney General for  
6 the country and I don't even think about it. I  
7 just start tweeting and I don't tell my husband, I  
8 don't tell anyone who loves me or cares about me  
9 because I know if they did, they would stop me  
10 because it was kind of like a kamikaze mission.  
11 And it was. It was a kamikaze mission and it kind  
12 of did destroy my life for a little bit and I kind  
13 of somehow knew it would.

14 But, you know, I couldn't deal with  
15 knowing that that had happened to Charlotte and on  
16 some level knowing that had happened to a lot of  
17 women and being responsible for it. So I had to  
18 speak up.

19 Q. Did anyone from Chambers reach out to  
20 you after you started tweeting and your first one  
21 saying it was worse than Friendly's or the ones  
22 after that to question what you were doing or tell  
23 you to stop or anything else along those lines?

24 A. One from [REDACTED], who  
25 I had, like, [REDACTED]

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2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED] [REDACTED]  
5 [REDACTED]

6 I had reached out to [REDACTED]  
7 [REDACTED] who had  
8 worked for the Governor and now works, I think,  
9 for [REDACTED]  
10 [REDACTED] but she had said "Well, I wanted to  
11 help you with, you know, connecting in Washington  
12 Heights or whatever, but do you really think -- I  
13 can't do that basically if you continue with what  
14 you're doing."

15 So those I got. I got a bunch of  
16 people who said thank you for coming forward, like  
17 people don't have the privilege I do to do that.

18 Then I kind of like -- my life  
19 exploded for a few days.

20 Q. Did any former employees of the  
21 Chamber reach out to you to try to convince you  
22 not to do what you're doing?

23 A. Well, I viewed both of those things  
24 kind of in that way, but no. I think at that  
25 point it was more the destroy Lindsey phase

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2 because, you know, I had gone out there and done  
3 something so public already, it was more the  
4 destroy Lindsey phase, which is when the personnel  
5 thing happened, which as a party, and the guy who  
6 works at -- [REDACTED]

7 Charlie King had reached out to  
8 several of my campaign staff to say "Are you  
9 really working for Lindsey?" and I lost my comms  
10 team. One of them was fine because it wasn't a  
11 great fit from the beginning, but I lost that and  
12 there was a lot of negative press that was  
13 planted, including by, as I've learned, Rich  
14 Bamberger, who alongside Josh Vlasto had a year  
15 and a half, maybe at the most two years before  
16 that -- maybe two years before that -- nominated  
17 me for a women's leadership award, which I  
18 received. So I just -- I think that's such  
19 bullshit and, you know, completely unethical and  
20 it's sad that [REDACTED], sad that [REDACTED]  
21 [REDACTED]. Surprisingly, they'll never  
22 work for that Cuomo guy.

23 Q. Who is Charlie King?

24 A. He's an ally of the Governor. He  
25 works at Manatt, I believe.

1 L. Boylan

2 Q. Did your staff tell you that Rich --

3 A. Yes.

4 Q. -- reached out to them?

5 A. Yes.

6 Q. What's the story that Rich Bamberger  
7 planted?

8 A. He's the one who was calling -- at  
9 least as I understand it -- you may know more but,  
10 I read it in the New York Times -- I think it was  
11 Times, maybe the Journal -- that Melissa, Steve  
12 Cohen and I think Rich maybe or whoever the third  
13 person was were in a huddle about what to do and  
14 the idea was to release this supposed personnel  
15 file, which I reject is my personnel file, not to  
16 say I've been perfect, but I reject that as a  
17 personnel file because A, I've never seen it and  
18 B, there was no such file when I was at ESD, which  
19 is where I spent the majority of my career at  
20 State and that he was directing press to reach out  
21 asking for it. That's my understanding of how  
22 that set up worked.

23 Q. Did you hear about this from anyone  
24 other than what you read in the press?

25 A. No. I read it in the press.

1 L. Boylan

2 Q. By the way, did you ever get formal  
3 performance evaluations at any time at ESD or the  
4 Chamber?

5 A. Formal? No. I got promoted twice.  
6 I got very positive feedback from my employees if  
7 we're considering a 360 and my employer, never  
8 anything negative, but I also frequently had to  
9 deliver, you know, negative news, so I wouldn't be  
10 surprised if some people didn't like me or didn't  
11 think I was fair or their brand, whatever, and  
12 then there was absolutely nothing in Chamber.

13 Q. At ESD, did you have to do written  
14 evaluations for anyone that reported up to you?  
15 I'm trying to get a sense of --

16 A. Performance reviews for all my  
17 employees.

18 Q. You broke up right now. If you could  
19 just repeat that -- I'm sorry.

20 A. Yes, I did annual reviews for my  
21 direct reports and they were documented.

22 Q. But Howard Zemsky didn't do similar  
23 ones for you?

24 A. I had a sit down and it was like  
25 doing well and I got to -- I mean, I knew I

1 L. Boylan

2 deserved it because I was working incredibly hard  
3 and we worked incredibly well together until we  
4 could no longer work together because of what I  
5 expressed to you. I knew that. Up until that  
6 point, he was like a dad and it was a great  
7 working environment. I worked my ass off and I  
8 really -- and I did -- and I did deserve those  
9 raises, but no, there was never, as I remember, a  
10 formal written thing. It was a conversation. It  
11 was a review, but it was a verbal thing.

12 Q. Did you ever hear from anyone  
13 including any reporters any other stories that  
14 they were trying to plant about you but maybe  
15 weren't successful?

16 A. Yes. Joseph Velasquez tried to have  
17 the Malontris (phonetic) thing become a story  
18 originally when I posted about the toxic women's  
19 environment. That was when I was running for  
20 Congress, during the course of that. Then the  
21 performance review and then losing two of my  
22 staffers, Charlie King was trying to promote --  
23 once all of this stuff happened, losing two of my  
24 staffers, Charlie King was promoting that, too.

25 Q. You mentioned talking to Charlotte.

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2 Did you keep in touch with her after  
3 December?

4 A. Yeah. I text with her all the time.

5 Q. I think you mentioned earlier having  
6 communication with Caitlin.

7 When did you first have any  
8 communication with Caitlin?

9 A. We overlapped and I actually reached  
10 out to her. Not at first. After my life  
11 exploded. There was a need to see if I could kind  
12 of help tell a bigger story if I was going to do  
13 this. Not only did I have to get my ducks in a  
14 row and you see how hard it is for me to do dates,  
15 so it took a while to tell the story the way it  
16 would capture how toxic this environment was and  
17 how abusive this environment was. I also started  
18 thinking, frankly, who are women who are close to  
19 him that were in what he would find attractive and  
20 I started reaching out to them and two of the  
21 first people I reached out to were Ana Liss and  
22 Caitlin.

23 Q. Who else did you reach out to?

24 A. I reached out to -- there was, like,  
25 a blonde haired regional rep person. I don't



1 L. Boylan

2 remember her name. I found her on LinkedIn.  
3 Someone I don't remember. She said she had a fine  
4 relationship. I said no worries. I said I was  
5 wondering if you want to talk about -- because if  
6 I was reaching out, they knew what I was reaching  
7 out about. So I said hey, I was hoping we could  
8 talk offline about something. She said "Oh, I  
9 only had a positive experience." Great. No  
10 problem. Moved on.

11 It's important to note that all of  
12 this didn't happen until well into the new year.  
13 This narrative that Rich as a party is pushing  
14 about the personnel file, I wasn't doing any  
15 outreach to anybody else when I tweeted that and I  
16 didn't do any outreach to anyone else until I  
17 think mid January or early January. So that's  
18 total bullshit. I hadn't reached out to a single  
19 person, I didn't have a lawyer, none of it.

20 But at that point, yeah. I think --  
21 I'm trying to think. There are one or two more  
22 people. [REDACTED]

23 [REDACTED], very attractive, similar  
24 coloring, I said "Would you be willing to talk  
25 offline?" She said "I am thinking about you, I

1 L. Boylan

2 would be happy to talk offline," but then we never  
3 did. I think she got scared away.

4 Then I did hear from [REDACTED].  
5 I didn't reach out to her because I had a lot more  
6 interaction with the Governor than she did. She  
7 reached out on her own, saying "I'm so sorry, I  
8 can't do anything to help or speak up." She has,  
9 like, [REDACTED]

10 [REDACTED], so I got it. I was really angry at  
11 her for not standing up for me later on, which I  
12 expressed to her, but other than that, I'm trying  
13 to think if there were other people -- oh yeah.  
14 There were a few other younger women that I  
15 reached out to. One or two I spoke with. I  
16 didn't say "Were you sexually harassed?" I said  
17 "Would you be up for a call offline?" I think  
18 there are two -- so many attractive women, I meant  
19 their coloring kind of fits into what I observed  
20 as a trend.

21 They said, you know, "I hated the  
22 environment, but I didn't have that specific  
23 experience," the two other women I spoke to,  
24 so ...

25 Q. Did you either then or at any other

1 L. Boylan

2 later point speak to any of the executive  
3 assistants up in Albany?

4 A. No.

5 Q. When you reached out and spoke --

6 A. There was one that I overlapped with  
7 who by now was in a far other agency, [REDACTED]  
8 something. She said "I've been thinking about  
9 you, love you lots, but I had a good experience."  
10 That was only one.

11 I really don't know anyone who is in  
12 this current batch. I don't know to my knowledge  
13 either of the women, either Alyssa or the unnamed  
14 women at all.

15 Q. When you reached out to Caitlin and  
16 Ana Liss, you said you wanted to tell a larger  
17 story.

18 What were you asking them to be a  
19 part of at that point?

20 A. I said hi, you know, sorry to bug  
21 you, you know me, you know what I've said already,  
22 I'm trying to see, you know, I know this happened  
23 to other women, I'm just trying to see if it's  
24 anyone that I might know so that if there's some  
25 way to -- you know, fight against this even behind

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2 the scenes, it would be helpful. I know we  
3 overlapped, you're a very beautiful woman and very  
4 hard working and that seems to be what he focused  
5 in on.

6 It wasn't like asking them for a  
7 specific commitment. Even when I came forward  
8 with my Medium piece, Charlotte and I had been  
9 texting back and forth and I had been apprizing  
10 her of what I had been thinking. When I posted,  
11 you know, I did it certainly hoping that she might  
12 come forward, but I didn't expect it.

13 Q. I certainly don't want to ask about  
14 any conversations with any lawyers, but there's  
15 some reference that suggests you had a lawyer  
16 prior to Jill?

17 A. I did. I did. They were perfectly  
18 nice and they helped me put my story together,  
19 which tells what I wanted to communicate about how  
20 insidious this is. I didn't know what to expect  
21 about this process. I thought I might come  
22 forward and I might be the only one and if my life  
23 had been destroyed, it would really be destroyed  
24 then, but I still felt like I had to do it. I  
25 thought I might say something and then try to go

1 L. Boylan

2 back to my campaign and have it be a totally  
3 different separate thing and be done.

4 Instead, what happened is it became a  
5 huge thing and these investigations and I felt  
6 like I needed a partner and a lawyer who was, you  
7 know, infinitely more sophisticated than I about  
8 how to navigate these really scary things which I  
9 find scary, so that's when I reached out to Jill.

10 Q. Obviously as a lawyer I'm not  
11 suggesting there's anything wrong with contacting  
12 a lawyer.

13 When did you retain prior counsel?

14 A. That was when they started  
15 retaliating against me. I had three different  
16 friends from Wellesley who are all lawyers say "Do  
17 you have a lawyer?" I think a lot of my friends  
18 know me and know that they were trying to paint me  
19 in a way that is, at worst, like I can't work with  
20 black women or, at worst, that I'm racist or  
21 something ridiculous like that. I think it pissed  
22 off a lot of my friends and they said "Do you have  
23 a lawyer? They're defaming you." Then I said  
24 "Oh, I need to get a lawyer."

25 So I would say it was probably within

1 L. Boylan

2 a week of when I tweeted, but after the press of  
3 the retaliation.

4 Q. And you've read some of the things  
5 that they were saying, of course.

6 Were you asking Caitlin or other  
7 women to join a lawsuit with you or class action?

8 A. So I got a lot of outreach. I didn't  
9 realize this was part of your all's business, like  
10 ambulance chasing thing. I got LinkedIns and I  
11 got -- in addition to numerous reporters who had  
12 my cell phone information and I didn't want to  
13 talk to anyone, as I explained in my tweets. I  
14 got a lot of outreach from lawyers and one, you  
15 know, like you heard from people who want to do  
16 that, like sue and why would I -- when I've spent  
17 my whole life to try to be in government -- why  
18 would I sue my own state that is struggling? So I  
19 had no interest in that.

20 What I had interest in was holding  
21 the Governor accountable and making sure he didn't  
22 do it to any other women. I knew if I stood  
23 alone, that's just me. If I could even privately  
24 get women to confirm this happened, I was thinking  
25 if I could somehow get on background Charlotte and

1 L. Boylan

2 other people -- not on background -- without their  
3 names to say that this happened, maybe it would  
4 make it so he couldn't do this to anymore women.

5 Q. At any point after 2021 did you reach  
6 out to other people that you worked with to see if  
7 they would corroborate what happened?

8 A. [REDACTED] I reached out to. [REDACTED]  
9 [REDACTED] I reached out to. I think I reached -- I  
10 tried to reach out to a bunch of people I thought  
11 I would trust. You know, I get it. Everyone is  
12 too afraid.

13 Q. Did anyone offer to come forward and  
14 support you of the people you reached out to?

15 A. I mean Caitlin, she's, you know,  
16 talked to Rebecca Trader and there are others like  
17 that. [REDACTED]

18 contributed to those stories. I'm sure I know  
19 tons that have, but very early on -- in fact, my  
20 earlier lawyer, I was told you should not be the  
21 receptacle of stories because you could be  
22 subpoenaed and if people don't want to tell their  
23 story, you shouldn't be the one doing it, so I  
24 kind of moved away from it and frankly, my life  
25 fell apart, so it was enough just to try to -- I

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2 [REDACTED] [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 MS. BASINGER: Anne, I don't know how  
6 much longer you have, but if you have a while  
7 still left, I want to give Lindsey a little  
8 bit of a break.

9 MS. CLARK: Sure. It's not hours  
10 more, so but it's not almost done, so I think  
11 this is a fine time for a break.

12 MS. BASINGER: Okay. About 15? 20?  
13 How's that?

14 MS. CLARK: How long do you want?  
15 Whatever you guys need.

16 THE WITNESS: Not like this isn't the  
17 highlight of my week, but --

18 MS. BASINGER: Believe it or not, you  
19 do need breaks. I know you don't believe  
20 that, but Anne will tell you.

21 Why don't we take 15?

22 THE VIDEOGRAPHER: Standby to go off  
23 the record, please.

24 This is the end of media unit three.

25 We are now off the record at



1 L. Boylan

2 4:30 p.m. for break.

3 (Recess taken)

4 THE VIDEOGRAPHER: This is the  
5 beginning of media unit four.

6 We are now on the record at  
7 4:47 p.m., back from break.

8 Q. I wanted to ask you about a couple  
9 documents. If you look at tab 19 --

10 A. Yes.

11 Q. Do you recognize this document?

12 A. Yeah. This is stuff I get on What's  
13 App from people who know state workers. You know,  
14 like they send this to me. I get tons of stuff  
15 like that. I don't know exactly who it relates  
16 to. The person who sent this to me is very  
17 connected into the Jewish community and my  
18 assumption -- visibly Jewish, excuse me -- my  
19 assumption would be that it's -- the person who  
20 had originally sent that was crossed out. But I  
21 don't know -- I don't know -- I get tons of stuff  
22 like that, oh, I've heard that, blah, blah, blah.

23 Q. Twenty is a similar thing?

24 A. Sorry. Yes.

25 Q. If you look at 21, it's a text, it

1 L. Boylan

2 looks like, from someone saying "You're destroying  
3 my reputation," etc.

4 Do you know have idea who this came  
5 from?

6 A. No. I mean, I would get a lot of --  
7 I had to turn off my Instagram comments and other  
8 sources, but this was the only one where I was  
9 like this is -- this one it was different  
10 obviously. So I shared it with Jill.

11 Q. Have you spoken to -- you can put  
12 that aside.

13 Have you spoken to any of the other  
14 women who have come forward publically or  
15 semi-publically about the investigation itself?

16 A. No. We -- I share articles like what  
17 an asshole he is every time he pretends to rewrite  
18 the sexual harassment laws and we provide each  
19 other with moral support. Anna did ask me, like,  
20 are you going to be do the assembly, I'm going to  
21 follow what you do and that kind of thing and I  
22 remain suspect of the politicization of the  
23 process but I do feel better about Davis Polk.

24 So those are the kinds of things that  
25 we talk about and it's really important for me to

1 L. Boylan

2 be connected with them because it helps me, but  
3 those are the kinds of things we discuss.

4 Q. I think when we spoke before that you  
5 said there were some women who reached out to you  
6 that you said you weren't sure if they wanted to  
7 come forward.

8 Do you know of any other women who  
9 were ready to come forward at this point or --

10 A. I know that I had heard that there  
11 was at least one woman in the State Patrol Unit  
12 that I had hoped you would be connecting with. So  
13 that I heard.

14 You know, at the end of the day, I'm  
15 really angry about people like Senior Staffer #3 but I'm  
16 also like -- [REDACTED] and I kind of feel  
17 like I hope that some people like that would come  
18 forward in a different way. You know?

19 Q. And I know you said you got a  
20 direction -- Jill said she gave you direction not  
21 to speak about our interview before.

22 Did anyone try to get information  
23 from you about our prior interview with you?

24 A. Yeah. I mean, every reporter.

25 Q. Aside from other press who I'm sure

1 L. Boylan

2 have --

3 A. No. No. Not that I can think of.  
4 If there's something more specific you're  
5 wondering, but only press that I can think of.

6 Q. There's one -- I forgot to ask you  
7 earlier.

8 Did the Governor ever make any  
9 comment about a scar on your knee?

10 A. Yeah. Yeah. I had had a bad  
11 horseback riding fall and, like, I couldn't go to  
12 something and he -- he said "How bad can it be?"  
13 and it was, like, a giant gash on my knee. So  
14 yeah.

15 Q. Did he say anything else about the  
16 scar on your knee?

17 A. He said something about my legs, like  
18 my nice legs and that was the first indication  
19 that I got that, you know, that was the first  
20 verbalization where I was talking about -- it's  
21 called a degloving injury, where it actually takes  
22 the stuff off your knee, so that's what I was  
23 talking about and then he took it in a different  
24 direction. He was very good at making you feel  
25 like you were having a normal conversation until

1 L. Boylan

2 you weren't.

3 Q. When did that conversation take  
4 place?

5 A. Right when I hurt my foot. I think I  
6 was supposed to be at something and then I  
7 couldn't go or something because I literally  
8 couldn't walk. That would have been -- how many  
9 years ago? Probably sometime in 2017 because  
10 that's the boundary line where it was like there  
11 was enough interaction with him and Stephanie  
12 was -- I thought I included this at some point,  
13 but I don't know if I made it.

14 She was always like "Do you have a  
15 pin yet?" You know, because we didn't use pin at  
16 ESD, we didn't use Blackberries at ESD, but that's  
17 all how he communicated directly to people because  
18 he didn't do email. And, you know, always wanting  
19 to be respectful, you know, like after things like  
20 that where I went on the plane and the GM thing, I  
21 would say that. On several -- like at least a few  
22 occasions, like in similar timeframe, she would  
23 say something like "Do you have a pin? You should  
24 tell him yourself" and I didn't.

25 Later on, as I was doing more work in

1 L. Boylan

2 Chamber, I did get a Blackberry, so I did have a  
3 pin. Where was I going with this? It felt like  
4 the effort was to -- you know, fish food, like  
5 feed me and other women like fish food to him. At  
6 first I didn't think so much of it because I'm  
7 like well, she's his assistant, this is a normal  
8 thing, this is how he communicates with people,  
9 you know, so -- I don't know what I was responding  
10 to with that but ...

11 Q. When he made the comment about your  
12 scar on your knee and legs --

13 A. It wasn't a scar at the time. It was  
14 an open gash.

15 Q. Okay.  
16 Was anyone else present?

17 A. No.

18 Q. Did anyone explain to you why the  
19 Governor preferred pins to emails?

20 A. Yeah, I think it was pretty  
21 universal, so he couldn't be tracked. He learned  
22 during being Attorney General that you didn't want  
23 to have email.

24 Q. Who told you that?

25 A. I feel like every person I ever

1 L. Boylan

2 interacted with.

3 Q. Did anyone explain to you whether  
4 pins were preserved or what happened to the pins  
5 after they were sent?

6 A. I heard that they were deleted or  
7 that they were destroyed.

8 Q. You described much earlier today  
9 Alfonso David talking about deleting emails.  
10 Did anyone else talk to you about  
11 deleting things on your emails?

12 A. Linda Lacewell said it regularly in  
13 staff meetings.

14 Q. Did she and Alfonso David say to  
15 delete all your old emails or did they say to --

16 A. Practice good email hygiene. I get  
17 it because there's always stuff like, you know, if  
18 I was a little bit curt in an email, someone could  
19 take it later. But I had kind of an ethical and  
20 moral issue with that because I'm going through  
21 and deleting my emails, I have something that I'm  
22 not comfortable defending and, you know, I know  
23 there's a bunch of stuff where I'm like you should  
24 do the right thing and it's just not my -- I don't  
25 think I did delete them, but as soon as I left,

1 L. Boylan

2 the whole thing is deleted.

3 Q. Couple other questions.

4 Did anyone ever ask you to delete  
5 specific emails?

6 A. Not that I can recall.

7 Q. Who is [REDACTED]

8 A. [REDACTED]

9 [REDACTED] She's a mom and we became particularly  
10 close.

11 Q. And is she somebody that you told  
12 about some of the things that happened in  
13 Chambers?

14 A. Yes.

15 Q. And did you ask her to sort of  
16 corroborate or --

17 A. I just asked her to share what she  
18 shared with me. I wasn't sure what I had, you  
19 know, told the small group of people, so I said,  
20 you know, whatever I shared with you, can you  
21 email me about it. You know?

22 Q. Did the Governor ever make any  
23 comments or ask any questions about your sex  
24 drive?

25 A. No. I mean, like I said, the



1 L. Boylan

2 innuendo thing, like the dog thing, that was,  
3 like, a constant, but I -- he asked me how long I  
4 was married for, that kind of stuff. That was  
5 weird. Not that I can of think. Not in a direct  
6 way like he did with Charlotte, based on what I  
7 read.

8 Q. Did you ever hear him talking about  
9 tattoos, people's tattoos?

10 A. No, but I heard about the butterfly  
11 thing, if that's what you're talking about. The  
12 thing he did say with me was -- one thing that is  
13 also scary is he kind of knows like I was really  
14 struck by how Charlotte is a rape victim and he  
15 talked to her about this.

16 For me, I love political speeches,  
17 I'm like a real geek and a nerd and I love these  
18 things and, you know, he's a politician. He's  
19 inappropriate and probing and just on the line and  
20 it's different based on who he's talking to is  
21 kind of my vibe, is my guess because some of the  
22 things he did with Charlotte he did in different  
23 ways to me.

24 Like he would say things like -- I  
25 remember one time he would ask me, like, about my

1 L. Boylan

2 husband's career, you know, like, how much -- you  
3 know, kind of insinuating how much money did he  
4 make and -- in front of other people and he would  
5 say oh, you guys are going to your house in blah,  
6 blah, blah and he would say -- at some point, he  
7 said you know, men get women through power or  
8 money. That's not about my sex drive, but it's an  
9 equally weird thing to say.

10 You know, I love political theory, I  
11 was a political theory major, I love to read nerdy  
12 books and I think he asked -- that's kind of the  
13 same question, but in a different tone, if I could  
14 say that.

15 Q. Did you ever hear him using a saying  
16 about old balls and young balls?

17 A. Eww. No.

18 Q. Then I'll spare you.

19 As you've read or talked to other  
20 women, heard Charlotte's story, heard more about  
21 Caitlin, Anna, other women, has anything reminded  
22 you about anything you didn't tell us last name?

23 A. The singing thing. That was very  
24 humiliating. The dog thing which I hadn't told  
25 you about. You know, new stuff I think of every

1 L. Boylan

2 day, not like major things, but it's -- I tried in  
3 my Medium piece to convey it was always kind of  
4 veering back and forth and I still don't think  
5 I've quite captured it and it's so unsettling  
6 because it can be totally appropriate sometimes  
7 and you just don't know.

8 You know, I totally believe every  
9 single one of those stories, like the Blackberry  
10 not working. I believe all of it. You know, what  
11 Caitlin had said about, you know, having to look  
12 up things and he's looking at her and it's too  
13 close and I believe absolutely every single thing.

14 Q. While you were working there, were  
15 there any instances where somebody was hired and  
16 you were told it was somebody that the Governor  
17 met at an event?

18 A. Oh, constantly.

19 Q. Any men that were hired?

20 A. No. Never. Never. Never.

21 Constantly. And a lot of times, they were placed  
22 in my agency.

23 Q. And can you remember the names of any  
24 of the women that were hired after the Governor  
25 met them at an event?

1 L. Boylan

2 A. [REDACTED]

3 [REDACTED] Yeah, other people. I mean, they  
4 were always attractive women.

5 Q. Can you recall any others?

6 A. Yeah, I'm sure I could. He tried to  
7 get me -- [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 That was one. He was, like, all hot to get her  
11 hired as soon as possible. Years ago, he tried to  
12 get her.

13 There was a woman who he was going to

14 [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] There were always women,  
18 pretty much from every event.

19 MS. CLARK: Joon or Jenn, before I do  
20 some wrap up, any other issues or items that  
21 I've overlooked?

22 MR. KIM: I don't think so. I think  
23 you covered pretty much everything I had on  
24 my list.

25 Q. I told you at the beginning that if

1 L. Boylan

2 there's any sort of statement you wanted to make  
3 on the record you're welcome to do so, either --  
4 anything we covered before or anything we didn't  
5 cover that you just want to put on the record, you  
6 have an opportunity to do so now.

7 A. Sure. You know, I've amassed -- I've  
8 spent more money in the last few months than the  
9 cost of my Columbia Business School degree.  
10 Everything about my family was turned upside down.  
11 This is not a fun experience for anyone. I think  
12 you know that, having been in this space. Anyone  
13 would only do it, I think, if it were really  
14 important and increasingly I see the Governor  
15 being even more cavalier about how he responds to  
16 this and I hope for accountability for all of the  
17 women here, but I fear even more what the  
18 implication is of just letting him do that and get  
19 away with it and all of it is very worth it if  
20 things are different for women moving forward and  
21 he just can't do that. He's doing this in front  
22 of everyone and I really hope that everyone is  
23 cognizant of that.

24 MS. CLARK: Thank you.

25 We're going to wrap up. I hope we're

1 L. Boylan

2 done for you today. There's a possibility  
3 that something could come up that we --

4 THE WITNESS: That's okay.

5 MS. CLARK: -- reconvene and talk to  
6 you again. If you come across other  
7 documents or your mom tells you she found  
8 something, get those -- my mom was the  
9 opposite, she threw everything away.

10 If you find any other documents, get  
11 them to Jill and she'll get them to us. And  
12 the other thing -- and we're doing this with  
13 everybody -- is we sent you and Jill those  
14 packets of exhibits and in keeping with  
15 keeping things confidential, we ask that you  
16 either return them to use or shred them or  
17 destroy them.

18 THE WITNESS: I'm happy to shred my  
19 darkest moments.

20 MS. BASINGER: Okay. You can set  
21 them on fire if you'd like to.

22 Thank you very much.

23 Now, Marco has to take us off the  
24 record.

25 THE VIDEOGRAPHER: I'm taking us off

1 L. Boylan

2 the record. We're not concluded, we're  
3 ending, correct?

4 MS. CLARK: Yes.

5 THE VIDEOGRAPHER: Standby, please.

6 Thank you.

7 We are off the record at 5:05 p.m.

8 This is the end of the recorded interview of  
9 the witness May 20th, 2021.

10 The total number of media units use  
11 was four and will be retained by Veritext New  
12 York. Thank you.

13 (Time noted: 5:05 p.m.)

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CERTIFICATION

I, SARA K. KILLIAN, RPR, CCR  
and Notary Public of the State of New York,  
do hereby certify that LINDSEY BOYLAN,  
the witness whose examination under oath  
is hereinbefore set forth, was duly sworn,  
and that such deposition is a true record  
of the testimony given by such witness.

I FURTHER CERTIFY that I am not  
related to any of the parties to this  
action by blood or marriage, and that I  
am in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 25th day of May, 2021.

A handwritten signature in black ink, appearing to read "Sara K Killian", written over a horizontal line.

SARA K. KILLIAN, RPR, CCR  
Notary Public of the State of New York